

Oil Conservation Division Energy, Minerals and Natural Resources Department State of New Mexico

CASE NO. 15753 LIST OF DIVISION EXHIBITS

Division Exhibit No. 1: Map Showing Location of Maralo Sholes B Well No. 2 (API 30-025-09806)

Division Exhibit No. 2: Well Completion Diagram for Maralo Sholes B Well No. 2

Division Exhibit No. 3: Division Administrative Order SWD-1127

Division Exhibit No. 4: Form C-105 (Well Record) for Maralo Sholes B Well No. 2

Division Exhibit No. 5: Form C-103 (Miscellaneous Reports on Well) dated June 30, 1947

Division Exhibit No. 6: Form 3160-5 (Sundry Notices and Reports on Wells) dated March 3, 1992

Division Exhibit No. 7: Form 3160-5 (Sundry Notices and Reports on Wells) dated March 6, 2009

Division Exhibit No. 8: Final Report and Recommendations Regarding Injection Survey Results for the Maralo Sholes B Well No. 2 (API 30-025-09806; SWD-1127) OWL SWD Operating LLC dated March 15, 2017

Division Exhibit No. 9: Form WR-05 (Application for Permit) File No. CP-1310 dated January 21, 2016

Division Exhibit No. 10: Form C-108 (Application for Authorization to Inject) dated May 9, 2008

Division Exhibit No. 11: Resume of Phillip R. Goetze, Oil Conservation Division

Exhibit 12: Rule. EXHIBIT 13; PICTURE OF WELL RISERS



Oil Conservation Division Energy, Minerals and Natural Resources Department State of New Mexico

CASE NO. 15753 Division Exhibit No. 1: Map Showing Location of Maralo Sholes B Well No. 2 (API 30-025-09806)





Oil Conservation Division Energy, Minerals, and Natural Resources Department State of New Mexico



Division

CASE NO. 15753 Division Exhibit No. 3

New Mexico Energy, Minerals and Natural Resources Department

Bill Richardson Governor

Joanna Prukop Cabinet Secretary Reese Fullerton Deputy Cabinet Secretary Mark Fesmire Division Director Oil Conservation Division



Administrative Order SWD-1127 June 1, 2008

APPLICATION OF FULFER OIL & CATTLE LLC FOR PRODUCED WATER DISPOSAL, LEA COUNTY, NEW MEXICO

ADMINISTRATIVE ORDER OF THE OIL CONSERVATION DIVISION

Under the provisions of Rule 701(B), Fulfer Oil & Cattle LLC (OGRID 141402) made application to the New Mexico Oil Conservation Division for permission to utilize for produced water disposal its Maralo Sholes "B" Well No. 2 (API No. 30-025-09806) located 660 feet from the South line and 660 feet from the East line of Section 25, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico.

THE DIVISION DIRECTOR FINDS THAT:

(1) The application has been duly filed under the provisions of Rule 701(B) of the Division Rules and Regulations;

(2) Satisfactory information has been provided that all offset operators and surface owners have been duly notified;

(3) The applicant has presented satisfactory evidence that all requirements prescribed in Rule 701 will be met;

(4) No objections have been received within the waiting period prescribed by said rule; and

(5) The operator is in compliance with the Division's Rule 40.

IT IS THEREFORE ORDERED THAT:

Fulfer Oil & Cattle LLC is hereby authorized to utilize its Maralo Sholes "B" Well No. 2 (API No. 30-025-09806) located 660 feet from the South line and 660 feet from the East line of Section 25, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico, in such manner as to permit the injection of produced water for disposal

Administrative Order SWD-1127 Fulfer Oil & Cattle LLC June 1, 2008 Page 2 of 3

purposes into the Lower Yates and Upper Seven Rivers formations through an openhole from 2938 feet to approximately 3055 feet and through plastic-lined tubing set with a packer located within 100 feet of the top of the injection interval.

IT IS FURTHER ORDERED THAT:

The operator shall take all steps necessary to ensure that the injected water enters only the proposed injection interval and is not permitted to escape to other formations or onto the surface.

<u>As preparation and prior to any injection</u>, the operator shall squeeze off the existing upper Yates gas perforations from 2733 feet to 2824 feet and <u>successfully</u> pressure test the casing prior to drilling out the intended open hole injection interval. The operator shall notify the Hobbs district office 72 hours prior to any squeeze and/or pressure test operations – so those operations may be witnessed by the Division.

After installing injection tubing, the casing-tubing annulus shall be loaded with an inert fluid and equipped with a pressure gauge or an approved leak detection device in order to determine leakage in the casing, tubing, or packer. The casing shall be pressure tested from the surface to the packer setting depth to assure casing integrity.

The wellhead injection pressure on the well shall be limited to **no more than 588 psi**. In addition, the injection well or system shall be equipped with a pressure limiting device in workable condition which shall, at all times, limit surface injection pressure to the maximum allowable pressure for this well.

The Director of the Division may authorize an increase in injection pressure upon a proper showing by the operator of said well that such higher pressure will not result in migration of the injected fluid from the injection formation. Such proper showing shall consist of a valid step-rate test run in accordance with and acceptable to this office.

The operator shall notify the supervisor of the Hobbs district office of the Division of the date and time of the installation of disposal equipment and of any mechanical integrity test so that the same may be inspected and witnessed.

The operator shall immediately notify the supervisor of the Hobbs district office of the Division of the failure of the tubing, casing, or packer in said well and shall take such steps as may be timely and necessary to correct such failure or leakage.

<u>PROVIDED FURTHER THAT</u>, jurisdiction is retained by the Division for the entry of such further orders as may be necessary for the prevention of waste and/or protection of correlative rights or upon failure of the operator to conduct operations (1) to protect fresh water or (2) consistent with the requirements in this order, whereupon the Division may, after notice and hearing, terminate the injection authority granted herein. Administrative Order SWD-1127 Fulfer Oil & Cattle LLC June 1, 2008 Page 3 of 3

The operator shall provide written notice of the date of commencement of injection to the Hobbs district office of the Division.

The operator shall submit monthly reports of the disposal operations on Division Form C-115, in accordance with Rule Nos. 706 and 1120 of the Division Rules and Regulations.

The injection authority granted herein shall terminate one year after the effective date of this order if the operator has not commenced injection operations into the subject well, provided however, the Division, upon written request by the operator received by the Division prior to the termination date, may grant an extension thereof for good cause shown.

MARK E. FESMIRE, P.E. Director

MEF/wvjj

cc: Oil Conservation Division – Hobbs Bureau of Land Management - Carlsbad

CASE NO. 15753 Division Exhibit No. 4

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FORM C-103

R.O.Y.

NEW MEXICO OIL CONSERVATION COMMISSION Santa Fe, New Mexico

MISCELLANEOUS REPORTS ON WELL

Submit this report in triplicate to the Oil Conservation Commission or its proper agent within ten days after the work specified is completed. It should be signed and sworn to before a notary public for reports on beginning drilling operations, results of shooting well, results of test of casing shut-offs, result of plugging of well, and other important operations, even though the work was witnessed by an agent of the commission. Reports on minor operations need not be signed and sworn to before a notary public. See additional instructions in the Rules and Regulations of the Commission.

Indicate nature of report by checking below:

REPORT ON BEGINNING DRILLING OPERATIONS		REPORT ON REPAI	RING WELL	
REPORT ON RESULT OF SHOOTING OR CHEMICAL TREATMENT OF WELL		REPORT ON PULL ALTERING CAS	ING OR OTHER	WISE
REPORT ON RESULT OF TEST OF CASING SHUT-OFF	X	REPORT ON DEEP	ENING WELL	
REPORT ON RESULT OF PLUGGING OF WELL				
	Mic	dland. Texas	S	June 30, 1947
OIL CONSERVATION COMMISSION Santa Fe, New Mexico. Gentlemen:		Place		Date
Following is a report on the work done and the res	sults ob	tained under the h	neading noted a	above at the
Ralph Lowe	S	holes	Well No.	2 in the
Company or Operator		Lease	26	
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The dates of this work were as follows:				
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Witnessed by <u>C. K. Lowe</u> Name	Ra	lph Lowe Company		Agent
Subscribed and sworn to before me this	2	I hereby sweat above is true Name Position A	r or affirm tha and correct.	t the information given
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Form 3160-5 (June 1990) Do not	UNIT DEPARTMEN BUREAU OF L SUNDRY NOTICES use this form for proposals to dri	ED STATES F OF THE INTERIOR AND MANAGEMENT AND REPORTS ON W Il or to deepen or reentry	RECEIVED IIAR & II OS III '92 ELLS 19/4 different reservoir.	FORM APPROVED Budget Bureau No. 1004-0135 Expires: March 31, 1993 5. Lease Designation and Serial No. LC 0.32581 (B) 6. If Indian, Allottee or Tribe Name
	SUBMIT	IN TRIPLICATE	oposais	7. If Unit or CA, Agreement Designation
1. Type of V	Well			
	Gas Under			8. Well Name and No.
2. Name of Maral	Operator O, Inc.			9. API Well No.
3. Address a	and Telephone No.	70702 0022	015 604-7441	30-025-09806
4. Location	of Well (Footage, Sec., T., R., M., or Survey De	scription)	515 004-7441	10. Field and Pool, or Exploratory Area
660'	FSL & 660' FEL Cinct	· P		11. County or Parish, Sine
				Lea, New Mexico
12.	CHECK APPROPRIATE BOX) TO INDICATE NATU	RE OF NOTICE, REPOR	T, OR OTHER DATA
	TYPE OF SUBMISSION		TYPE OF ACTION	
	X Notice of Intent	X Abandonm	cnt	Change of Plans
		Recompleti	ion .	New Construction
	L_ Subsequent Report		ack	Water Shut-Off
	Final Abandonment Notice		asing	Conversion to Injection
		L_1 Other		(Note: Report results of multiple completion on Well Completion or Recompletion Report and Log form.)
13. Describe	Proposed or Completed Operations (Clearly state al	pertinent details, and give pertinent of all denths for all markers and zones	dates, including estimated date of starting	any proposed work. If well is directionally drilled,
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State of New Mexico Divisio Energy, Minerals and Natural Resources Department

Susana Martinez Governor

Ken McQueen Cabinet Secretary

Matthias Sayer Deputy Cabinet Secretary

March 15, 2017

TO: David Catanach, Director, OCD Ducc Daniel Sanchez, UIC Program Manager, OCD

FROM: Phillip Goetze, Engineering Bureau, OCD

RE: FINAL REPORT AND RECOMMENDATIONS REGARDING INJECTION SURVEY RESULTS FOR THE MARALO SHOLES B WELL NO. 2 (API 30-025-09806; SWD-1127); OWL SWD OPERATING LLC

This document is a summary of recent activities related to the testing for the Maralo Sholes B Well No. 2 (the "subject well") performed by the operator, OWL SWD Operating LLC (OWL or the "Operator"). The subject is located 660 feet from the South line and 660 feet from the East line (Unit letter P) of Section 25, Township 25 South, Range 36 East, NMPM. The well is approximately one mile west of the City of Jal in southeastern New Mexico (see Figure 1). The well is located on federal mineral estate under the regulatory authority of the Bureau of Land Management.

The authority to inject was approved by administrative order SWD-1127 dated June 1, 2008. The order approved an injection interval from 2938 feet to approximately 3055 feet below surface in the lower Yates and upper Seven Rivers Formations. The injection interval is open hole and the maximum surface injection pressure is limited to 588 pounds per square inch (psi).

The origins for the investigation of the subject well was due to the following initiatives:

- 1. The Oil Conservation Division (the "Division") received a formal correspondence from the City of Jal dated April 28, 2016;
- The review of three applications (Administrative applications No. pMAM1530041540 [Abyss SWD No. 1]; No. pMAM1530040908 [Mojo SWD No. 1]; and No. pMAM1530039137 [Nomad SWD No. 1]) by OWL for additional commercial disposal wells in the same vicinity of the subject well with similar proposed disposal intervals; and
- The Division's review to a formal request by the United States Environmental Protection Agency (EPA) correspondence dated August 31, 2016, to review current oil and gas injection activities within New Mexico that may potentially impact Underground Sources of Drinking Water (USDWs).

The Division submitted a request as a Notice to Operator dated July 28, 2016, to initiate an injection survey for the subject well. The deadline to complete requested survey was modified on several occasions due to equipment limitations, due to well conditions, and due to

1220 South St. Francis Drive • Santa Fe, New Mexico 87505 Phone (505) 476-3441 • Fax (505) 476-3462 • email: www.emnrd.state.nm.us/ocd

David R. Catanach, Division Director Oil Conservation Division



CASE NO. 15753 Division Exhibit No. 8

Report Regarding Injection Surveys: Maralo Sholes B Well No. 2 OWL SWD Operating LLC March 15, 2017 Page 2 of 9

scheduling/availability issues. Two different injection surveys were completed; the second survey being conducted after the open-hole portion of the well was cleared of debris following the initial injection survey.

The three cited applications for new disposal wells in this area as the subject well were reviewed by the Division during the fourth quarter of 2015. All three applications were denied in November 2015 as not being qualified for approval through an administrative review process and would require an examiner hearing for the review.

SUBJECT WELL CONSTRUCTION AND HISTORY:

The subject well was spudded on May 25, 1947, and was completed as an oil producer in the Yates Formation on June 30, 1947. The production was from an open-hole interval beginning at the shoe of the 7-inch production casing set at 2935 feet below ground surface (BGS) to a total depth of 2950 feet BGS. Figure 3 provides a current well completion diagram.

Following a period of oil production, the well was recompleted in 1961 with bottom plugged back and shallow perforations added from 2871 feet BGS to 2910 feet BGS to produce from a gas sand zone in the Yates.

The well files showed three sizes of casing being used for the construction of the well. One exclusive feature of the well is the 8%-inch intermediate casing which has no cement in the annulus between the casing and borehole and was reported as having the shoe of the casing sealed only with drilling mud. This portion of the borehole was reported to penetrate the Santa Rosa Formation, a 10-foot water show in the Rustler Formation, and a single stringer of salt above the major salt interval at 1250 feet BGS (see Figure 3).

The well was proposed for plugging on October 26, 1993, but the Notice of Intent was subsequently withdrawn. The remaining period between 1993 and 2003, when Southwest Royalties, Inc. became the new operator, are not documented in the Division's well file. In 2003, Southwest Royalties, Inc. initiated plans to convert the producing well to a disposal well, but did not complete the application process and the well was placed into a temporary abandonment status.

Notice for the conversion of the well to a disposal well was initiated on May 19, 2008, after Division received an application from the Fulfer Oil and Cattle Company, LLC (Fulfer).

INJECTION HISTORY OF SUBJECT WELL:

In 2008, a revised application was submitted to the Division to convert the well by performing remedial action to squeeze cement the perforations used in the recovery from the gas sand and deepening the open hole interval to 3055 feet BGS.

In the C-108 application provided to the Division, the applicant included the following information:

1. [Response to C-108 Section VII, Item 1] the proposed daily injection rate and sources as being "5000 bpd of produced water from Fulfer's own operation and surrounding production of the same waters."

2. [Response to C-108 Section VII, Item 4] the sources are described as "only produced water from formation in this area."

The C-108 application also included an extensive discussion by the Division, including the Hobbs District Geologist, to determine the potential of the Capitan Reef complex being part of the proposed interval. The District Geologist provided his opinion in an e-mail dated May 16, 2008, that "the reef is not present in the area of the proposed disposal" and further states that the "Reef is probably at least a mile or more to the west."

The Division reviewer also noted that an area of review (AOR) well, the Sholes B 25 Well No. 1 (API No. 30-025-09812; Unit letter H of Section 25, Township 25 South, Range 36 East, NMPM), should be plugged or temporarily abandoned (see Figure 2). Both this AOR well and the subject well produced from the Jalmat; Tansill-Yates-Seven Rivers (Oil) pool (pool code: 33820; referred to as the "Jalmat pool"). The application also lists another AOR well, the Humphreys Well No. 1 (API No. 30-025-09815), as being "inactive".

With this information, the administrative order was issued and injection in the well commenced on January 6, 2009, with a reported average daily injection rate of 3,000 barrels. Injection continued until the end of November 2014 with the same operator and averaged an injection rate of 3,843 barrels of water per day (BWPD) with a peak injection rate for a single month being 6,088 BWPD (August 2010) (see Graph 1). Change of ownership of the subject well occurred in late 2015 and OWL commenced injection in 2016 averaging 18,427 BWPD with a peak injection for a single month being August 2016 with 34,580 BWPD.

INJECTION SURVEYS:

Prior to the commencing the first injection survey, the Division requested that the Operator install a bradenhead valve for the 8¹/₈-inch intermediate casing. This was to be monitored for any changes in pressure in this annular space during the injection surveys.

The well was initially tested in September 2016 without any modifications or maintenance of the injection interval. Results of this first survey activity were inconclusive in presenting the distribution of injection fluids for the entire permitted interval due to debris in the borehole. However, the pre-survey testing for the first survey effort did not demonstrate upward migration of fluids between the production casing and the intermediate casing or any issues with the existing tubing and packer system. A copy of the survey results is found in Attachment 3.

The Division and representatives from OWL participated in a meeting in Santa Fe on October 24, 2016. The result of the meeting was to have a new survey with an injection profile over the entire open-hole interval along with an additional effort to be conducted by OWL to demonstrate that the injection interval is not hydrologically connected with the Capitan Reef aquifer system.

Prior to the second testing of the injection interval, the Operator replaced and replumbed the valve recently installed in the 8⁵/₈-inch casing for monitoring of annular pressure for this casing.

Consultant for OWL provided a Sundry NOI to the District Supervisor for the second injection survey on November 15, 2016, following discussions on possible deepening of the exiting open-

hole interval to provide additional borehole depth to accommodate survey logging tools. This proposal was withdrawn by the consultant and the final proposed plan included only a cleaning of the borehole to the original depth of 3055 feet BGS.

OWL activities for the second test at the well were initiated on November 28, 2016, and completed on December 9, 2016. Copies of the survey results are found in Attachments 5 and 6.

Mr. Chad Kronkosky, P.E., CEK Engineering LLC (CEK) of Lubbock, TX, conducted a review of the injection survey results and compiled a summary report on behalf of OWL. The report was forwarded through the Operator to the Division on January 20, 2017. This report included the efforts to address the items found in the Division's Notice to Operator. A copy of the report is included as Attachment 7.

ADDITIONAL INFORMATION SOURCES:

As part of this effort, the Division compiled and reviewed other sources of data and information available through public sources or personal communications. One of these documents was the Hydrologic Investigation Report prepared by Souder, Miller and Associates (2015) on behalf of the City of Jal. The report presented a thorough evaluation of the hydrology and ground water sources in this area including the Westfield Facility, the current municipal well field for the city. The report identified both the Santa Rosa Formation of the Dockum Group and the Capitan Reef aquifer as potential sources for assessment and possible future development to provide sustainable water sources for the city.

Another source for investigation of the hydrology for this area of Lea County was a presentation by Dr. Lewis Land of the National Cave and Karst Research Institute/New Mexico Bureau of Geology and Mineral Resources (NMBGMR) with regards to water levels in this area of the Capitan Reef aquifer. Dr. Land and the Bureau of Land Management (BLM) have attempted to assess and quantify the impacts of multiple sources (such as drought cycles, diversions of the Pecos River, agriculture uses, oil and gas industry uses, municipal area uses, etc.) on the Capitan Reef aquifer by continuing the effort to monitor the existing groundwater network in Eddy and Lea Counties.

CONCLUSIONS:

The Division reviewed all the submittals by OWL, the information provided to the Division and Division's records and offers the following conclusions:

- 1. The injection surveys completed by the Operator have demonstrated that injection fluids are entering the approved interval described in Administrative order SWD-1127 for the rate of injection used in the surveys. The injection survey results also indicate no vertical migration of disposal fluids to shallower formations.
- 2. Though the injection surveys did not demonstrate migration to shallower formations, the technical review and subsequent administrative order SWD-1127 did not contain a condition for remedial action to be completed on the open annulus of the 8⁵/₈-inch intermediate casing where two USDWs are exposed to the Salado formation with its salt intervals. The current well construction is in violation of Rule 19.15.16.10(A) NMAC and,

4.19

with continued disposal operation, increased risk for impacts to USDWs if this situation is not addressed.

3. The calculations for assessing the radius of influence (Perturbed/Displaced reservoir Volume Due to Injection (Kronkosky, 2017)) estimated an effected area of 223 acres based on the current total of injection volume. Though these calculations are viable, the model used for these calculations assumes a radial, uniform growth of the injection plume under homogeneous and isotropic conditions.

Division contends that location of the well in the backreef transition into the Capitan Reef lithosome (and inclusive aquifer) in not lithologically homogenous and is modified by structural features, such as the South Jal submarine canyon (Hiss, 1975), which impacts flow direction and transmissivity (see Figure 4C). These features result in a model with a geometry that is non-radial and very susceptible to a preferred flow direction. This model is further augmented by the higher specific gravity of the disposal fluids and its preference to migrate in the down-dip direction towards the west, in general, and possibly north due to the effects of the South Jal submarine canyon. This model would favor a migration of disposal fluids towards the lithostratigraphic boundary of the Seven Rivers Formation and the Capitan Reef, as presented in cross sections by Kronkosky (2017) and Hiss (1976), with the opportunity to impact the Capitan Reef aquifer (see Figure 4D).

4. Additionally, there is indication of impacts to correlative rights and the existing production from wells still active in the Jalmat pool. The AOR well identified in the C-108 application review, the Sholes B 25 Well No. 1 (API No. 30-025-09812), showed a significant increase in water cut from production in the same interval being used for disposal. This producing well is north of the subject well and has a continuous record of monthly production starting prior to 1993 (see Figure 2).

The well is completed with an open hole interval from 2906 feet to 2950 feet. Prior production information showed a period that well was shut-in in 1979 due to high water production. The average production at this time was reported as 10 barrels of oil per day (BOPD), six thousand cubic feet of gas (MCFPD), and 1000 BWPD. A 24-hour test conducted in 1982 showed production results of 27 barrels of oil (BO), 35 thousand cubic feet of gas (MCF), and 936 BW.

Graph 2 shows a summary of production (gas and water) for the Sholes B 25 Well No. 1 for a period beginning in 2007. Prior to the period of the graph, no significant water production was reported during a period from 2004 to 2007. However, with the increased injection rates utilized by OWL, the graphed data showed a significant increase in the water cut for this well.

For November 2016, this well reported 182 MCF produced with 50,400 BW during 19 days of operation and in the following month reported 204 MCF of gas produced along with 71,067 BW during 31 days of operation. The reported totals for the four previous months in 2016 starting with July were as follows: 5 BO, 361 MCF, 599 BW, 31 days of

operation; 296 MCF, 564 BW, 25 days of operation; 322 Mcf, 0 BW, 30 days of operation; and 355 MCF, 78 BW, 31 days of operation.

There are no other producing wells adjacent to the subject well that have continuous monthly reporting for this same period. The only active injection well, the Sholes B 25 Well No. 2 (API No. 30-025-09808), in the vicinity of the subject well shows significant lower injection volumes for the same period of review and is interpreted as having little influence on the production of the Sholes B 25 Well No. 1.

- 5. The operation of the subject well is not consistent with the information provided in the Form C-108 application submitted for administrative review by the Division. Sources proposed for disposal in the subject well were identified as being from the area and, primarily, for the produced water from the original applicant with primary production from the Jalmat pool. Based on volumes, the subject well is now a commercial operation and the current operator has not provided any supplemental information as to the additional sources of the produced water or its water quality.
- 6. The Capitan Reef aquifer in this southern area of Lea County continues to have an increase in water levels as represented by measurements from deep monitoring wells located in the Reef. Figure 6 shows a significant decrease in the depth-to-water for the aquifer with the Southwest Jal monitoring well demonstrating a rise of over 400 feet in the water level for a 35-year period. As proposed by Land (2016), the only source with potential for such impacts would have to be associated with the disposal activities of UIC Class II wells.

If the City of Jal is going to have the opportunity for the future assessment of this portion of the Capitan Reef aquifer for municipal use, the Division should make every effort to minimize all potential sources that may impact the aquifer. This should include commercial disposal operations in shallower zones above the Capitan Reef aquifer in the vicinity.

Finally, the Operator's report provides the following statement regarding water quality:

"The WELL's equivalent (injection interval) in the Capitan Reef (Late/Upper Seven Rivers) Margin is located 3.5+ miles to the west and approximately 200-300' down dip structurally. Additionally, in our opinion, there is sufficient evidence (HISS 1975, NMOCD Case No. 8405 testimony/Water Sample Analysis, IC Potash Corp Feasibility Study) that the interstitial waters of the Capitan Reef and back reef Artesia Group members near the WELL are mineralized above 10,000 mg/L (TDS), digital copies provided on FTP site."

Division counters that the Capitan Reef is shown to have occurrences of both water quality below and above the 10,000 milligrams per liter (mg/L) total dissolved solids (TDS) threshold as defined in Rule 19.15.2.7(U)(1) NMAC. In response to the examples offered in the report:

 Hiss (1975) provided a figure compiling water quality that showed historical dissolved chloride concentrations for this area of the Capitan Reef aquifer (CPAQ) ranging from 1,200 to 3,300 mg/L (see Figure 4B). Samples obtained from intervals in the Seven Rivers Formation (SVRV) range from 1,900 to 18,000 mg/L while the samples from the shallower Yates Formation (YTES) range from 1,500 to 69,000 mg/L.

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Report Regarding Injection Surveys: Maralo Sholes B Well No. 2 OWL SWD Operating LLC March 15, 2017 Page 7 of 9

- The referenced sample for Case No. 8405 (offered as Exhibit 1) for Division Order R-7935 demonstrated a TDS of 12,856 mg/L for the Capitan Reef from a well located 4.2 miles to the northwest [West Jal Disposal No. 1; API 30-025-26676; last injecting at an average of 3,576 BWPD into 10 feet of perforations].
- 3. The IC Potash report (Crowl et al, 2011) provided an extensive discussion of the Jal Water System, a former municipal water source currently being operated by Chevron for oil and gas operations. This report included an assessment for water quality for its proposed production field ranging from 8,000 parts per million (ppm) to 13,000 ppm based on data from the Jal Water System wells.

The approach to characterize the Capitan Reef aquifer based on limited water quality information is not acceptable to support the statement that this aquifer is not protectable as a USDW, and additionally, does not satisfy the requirements for determination of an Exempted Aquifer as accepted under New Mexico State Demonstration for Class II Wells as detailed in 40 CFR 146.4.

RECOMMENDATIONS:

Based upon the findings of the testing and the reports, the Division recommends the following actions for the Director to consider:

- For the Operator: Amend Administrative order SWD-1127 to include a maximum daily injection rate of 6550 BWPD. This rate was based on the maximum injection rate used for the second survey that showed disposal fluids confined to the approved interval. This maximum injection rate was also consistent with the daily rates of injection by the prior operator for the operation of the well during 2010 and 2011 report periods.
- For the Operator: Include in the amended order a requirement for the operator to install a monitoring system at the wellhead to verify and document this disposal rate for inspection of the well site and that can be compiled for later review.
- 3. For the Operator: Require the operator to submit a remedial plan that shall seal the shoe and the length of the 8%-inch intermediate casing as to isolate the following lithologies in the annulus of the borehole: the salt section, the identified occurrence of groundwater in the Rustler formation and the exposed section of the Santa Rosa Formation. This remedial plan should be submitted in a C-103 Sundry Notice of Intent to the District Supervisor for review and approval.
- 4. For the Operator: Require the operator to provide a list of produced water sources representative of current fluids being disposed in the subject well. This submittal would also provide laboratory analyses representative of the major volumes or from the tank battery/pipeline for the subject well.
- 5. For the Division: Continued compilation and verification of hydrologic information including current efforts by the New Mexico Office of the State Engineer, the USGS, the BLM and the NMBGMR for this area of the Capitan Reef aquifer system.

The effort to assess and manage injection of the area of Jal is necessary to provide a minimum potential to impact the Capitan Reef aquifer in this area. This allows the maintenance of the current aquifer system without additional contributions from shallow disposal at high rates of injection and the opportunity for assessment of the USDWs in this area by the City of Jal. If the investigation of the aquifer determines that there are portions which can be excluded based on criteria in 40 CFR

Report Regarding Injection Surveys: Maralo Sholes B Well No. 2 OWL SWD Operating LLC March 15, 2017 Page 8 of 9

146.4, then a hearing can be conducted to establish an Exempted Aquifer based on applications for future disposal in this interval.

REFERENCES:

- Crowl, W. J., Hulse, D. E., and Tucker, G., 2011, Prefeasibility study for the Ochoa Project, Lea County, NM; NI 43-101 Technical Report, prepared by Gustavson Associates for IC Potash Corporation;
- Harris, P. M., and Saller, A. H., 1999, Subsurface expression of the Capitan depositional system and implications for hydrocarbon reservoirs, northeastern Delaware Basin: *in* Geologic Framework of the Capitan Reef: Society for Sedimentary Geology (SEPM), Special publication No. 65, p. 37-49.
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- Hiss, W. L., 1975, Stratigraphy and ground-water hydrology of the Capitan aquifer, southeastern New Mexico and western Texas: University of Colorado Department of Geological Sciences, Ph.D. Dissertation, 396 p.
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- Hiss W. L., 1976a, Structure of the Permian Guadalupian Capitan aquifer, southeast New Mexico and western Texas: New Mexico Bureau of Geology and Mineral Resources Resource Map 6; one page.
- Hiss, W. L., 1980, Movement of ground water in the Permian Guadalupian aquifer systems, southeastern New Mexico and western Texas: *in* New Mexico Geological Society Guidebook, 31st Field Conference, Trans-Pecos Region, p. 289-294.
- Land, Lewis, 2016, Using brackish water from karstic aquifers to augment freshwater resources in the semi-arid southwest, Paper No. 31-4; Geological Society of America Annual Meeting, Denver Colorado.
- Souder, Miller and Associates, 2015, Hydrologic Investigation Report, City of Jal Water Rights Appropriation Project, Jal, Lea County, New Mexico; prepared for the City of Jal, p. 110.
- Records of the New Mexico Oil Conservation Division: Publicly available information (well files, hearing orders, case files, production information) offered through E-permitting, Imaging and GIS databases.

FIGURES:

FIGURE 1: General Location Map of City of Jal and Related Geologic Features

FIGURE 2: Aerial Photograph Map Showing Major Features and Wells Near the Maralo Sholes B Well No. 2 Location Report Regarding Injection Surveys: Maralo Sholes B Well No. 2 OWL SWD Operating LLC March 15, 2017 Page 9 of 9

FIGURE 3: Maralo Sholes B No. 2 Well Diagram

FIGURE 4: Relevant Excerpts from Referenced Reports on the Capitan Reef Aquifer

FIGURE 5: Hydrographs of Capitan Reef Aquifer Monitoring Wells Near Jal, New Mexico

GRAPHS:

GRAPH 1: Daily Injection Rate vs. Time: Maralo Sholes B Well No. 2 (30-025-09806; SWD-1127)

GRAPH 2: Recent Production vs. Time: Sholes B 25 Well No. 1 (30-025-09812)

ATTACHMENTS:

Attachment 1: New Mexico Oil Conservation Division: Notice to Operator dated July 28, 2016 Attachment 2: City of Jal Correspondence dated April 28, 2016

Attachment 3: OWL SWD Operating LLC: Results of Indepth Injection Profile dated September 2, 2016

Attachment 4: OWL SWD Operating LLC: Daily Summaries for Second Injection Surveys

Attachment 5: OWL SWD Operating LLC: Results of Indepth Injection Profile dated December 2, 2016

Attachment 6: OWL SWD Operating LLC: Results of Pump-In Tracer dated December 2, 2016 Attachment 7: CEK Engineering LLC: Final UIC Geological Assessment dated January 12, 2017

 Cc: UIC Class II Program Imaging File Administrative Order SWD-1127 Well File API 30-025-09806 Oil Conservation Division – Hobbs District Office Ben Stone, SOS Consulting, LLC Robert Gallagher, Mayor, City of Jal and City Council members Nevin Bannister, OWL SWD Operating, LLC

CASE NO. 15753 Division Exhibit No. 9 File No. C.P. 1310 **NEW MEXICO OFFICE OF THE STATE ENGINEER** APPLICATION FOR PERMIT TO APPROPRIATE

(check applicable boxes):

For fees, se	e State Engineer website: http://www.ose.state.nm.us/	2.	34210
	Application to Appropriate Surface Water (72-5-1)		
	Application to Appropriate Groundwater (72-12-3)		
Temporary Request - Requested Start Date:	Requested End Date:		

1. APPLICANT(S)

Lea

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[
Name:		Name:	
Fulfer Oil & Cattle Company	Fulfer Oil & Cattle Company, L.L.C.		ociates, Inc.
Contact or Agent:	check here if Agent	Contact or Agent:	check here if Agent 🗹
Gregg Fulfer		Richard Cibak	
Mailing Address: P.O. Box 578		Mailing Address: 2904 W 2nd St	
City: Jal		City: Roswell	
State: NM	Zip Code: 88252	State: NM	Zip Code: 88201
Phone: (575) 631-0522 Phone (Work):	Home 🗹 Cell	Phone: Phone (Work): (575) 624	-2420
E-mail (optional):		E-mail (optional): richard@atkinseng.com	

2. PURPOSE OF USE AND AMOUNT OF WATER

Domestic Livestock Irrigation Municipal Industrial Commercial Other Use (specify):	Amount of Water (acre-feet per a needed, type "See Comments" in in Additional Statements Section.	nnum): If more details are "Other" field below, and explain
Describe a specific use If applicable (i.e. sand & gravel washing, dairy etc):	Diversion: Consumptive Use:	100 AF/AN
Commercial Water Sales	Other (include units):	
3. COUNTY WHERE WATER RIGHT WILL BE USED		

	FOR OSE INTERNAL USE	Application for Permit, Form wr-05, Rev 4/12/12
	File Number: CP- 1310	Tm Number: 543965
POD Renumbered	Trans Description (optional): POD	Appro
12 1310	Sub-Basin:	
From: Charles	PCW/LOG Due Date:	PBU Due Date:
TO: CP1310 POOT	L	Page 1 of 4

4. POINT(S) OF DIVERSION (POD)

-

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7

Surface POD OR	Ground Water POD	(Well)	
Name of ditch, acequia, or	spring:		
Stream or water course:			Tributary of:
If application proposes a new Attachment 2.	point of diversion invo if Attachment 2 is inc	olving a diversion of cluded in this appli	lam, storage dam, main canal, and/or pipeline, complete cation packet.
POD Location Required: Co Latitude/Longitude (Lat/Lon District II (Roswell) and Dist	ordinate location mi g - WGS84). trict VII (Cimarron) c	ust be reported in ustomers, provid	NM State Plane (NAD 83), UTM (NAD 83), <u>or</u> e a PLSS location in addition to above.
NM State Plane (NAD83) NM West Zone NM East Zone NM Central Zone	(Feet) 🔽 L	JTM (NAD83) (Met]Zone 12N]Zone 13N	ers) Lat/Long (WGS84) (to the nearest 1/10 th of second)
POD Number:	X or Easting or Longitude:	Y or Northing or Latitude:	Provide if known: -Public Land Survey System (PLSS) (<i>Quarters or Halves , Section, Township, Range</i>) OR - Hydrographic Survey Map & Tract; OR - Lot, Block & Subdivision; OR - Land Grant Name
CP-1310 PODI	668604.27*	3552457.15*	Center 10 Acres of the SE/4 SE/4, Section 25, Township 25S, Range 36E N.M.P.M.
*Applicant's Well ID 108			*UTM (NAD 83) (meters) location data is provisional
NOTE: If more PODS need to Additional POD descriptions	o be described, com s are attached:	plete form WR-08 Yes	B (Attachment 1 – POD Descriptions) If yes, how many
Other description relating poin	t of diversion to comm	non landmarks, str	eets, or other:
Note: The following informa	tion is for wells only	. If more than one	e (1) well needs to be described, provide attachment.
Approximate depth of well (fee	et): Up to 500		Outside diameter of well casing (inches): 13 3/8
Driller Name: Licensed New	Mexico Well Driller		Driller License Number: TBD

FOR OSE INTERNAL USE	Application for Permit, Form wr-05
File Number: CP-1310	Trn Number: <u>543965</u>
	Deere 2 of 4

Page 2 of 4

2

5. PLACE(S) OF USE

1

5

Legally Departied By:		d		6
 ✓ Public Land Survey System (PLSS) ☐ Hydrographic Survey Report or Map ☐ Irrigation or Conservation District Map ☐ Subdivision PLSS Quarters or Halves, <u>and/or</u> Name of Hydrographic Survey or District, <u>and/or</u> Name and County of Subdivision 	c. PLSS Section <u>and/or</u> Map No. <u>and/or</u> Lot No.	d. PLSS Township <u>and/or</u> Tract No. (Please list each tract individually) <u>and/or</u> Block No.	e. PLSS Range	r. Acres
All	All	21S	32E-38E	
All	All	22S	32E-38E	
All	All	235	32E-38E	
All	All	24S	32E-38E	
All	All	25S	32E-38E	
All . Other description relating place of use to common	All a landmarks, street	26S s, or other:	32E-38E	
. Place of use is on land owned by (required): aries				

FOR OSE INTERNAL USE	Application for Permit, Form wr-05
File Number: CP- 1310	Trn Number: 5439465

Page 3 of 4

6. ADDITIONAL STATEMENTS OR EXPLANATIONS

Application is made to appropriate up to 100.0 acre feet per annum of shallow groundwater from the Capitan Underground Water Basin for commercial and/or industrial uses. The total consumptive use of water under this application will be limited to 100.0 acre-feet per annum.

ACKNOWLEDGEMENT

Richard C. Cibak (Atkins Engineering Associates, Inc.) agent for the Applicant I, We (name of applicant(s)),

Print Name(s)

foregoing statements are true to the best of (my, our) knowledge and belief. affirm that the

X approved

Applicant Signature

Applicant Signature

ACTION OF THE STATE ENGINEER

This application is:

partially approved denied

provided it is not exercised to the detriment of any others having existing rights, and is not contrary to the conservation of water in New Mexico nor detrimental to the public welfare and further subject to the attached conditions of approval

Witness my hand and seal this 21 day of	January 20 <u>16</u>	_ , for the State Engineer,
Tom Blaine, D.E.	, State Engineer	
By: Signature	Andy Morie	у
Title: District II Manager		
TV3		2
	9 · 1912 · U	
		Application for Descrit Formum OF
	File Number: CP 1310	Trn Number: 543965
		Page 4 of 4

NEW MEXICO OFFICE of the STATE ENGINEER APPLICATION FOR PERMIT TO APPROPRIATE UNDERGROUND WATERS

SPECIFIC CONDITIONS OF APPROVAL

PBU Proof of Beneficial Use must be filed on or before 01/31/2020. PCW Proof of Completion of Well must be filed on or before 01/31/2018. 1. This application is approved as follows: Permit Number: CP-1310 Water Source: Artesian Groundwater Points of Diversion: SECTION WELL. TOWNSHIP RANGE SUBDIVISION 25 25 S. 36 E. CP-1310-POD1 Center 10 acres of the SE1/4SE1/4

Place of Use: Land owned by various entities within Lea County in

SUBDIVISION	SECTION	TOWNSHIP	RANGE
All	1-36	21 S 26 S.	32 E 38 E

Purpose of Use: Commercial and Industrial Purposes

Amount of Water: Up to 100.0 acre-feet per annum (Consumptive Use)

2. The consumptive use of artesian groundwater from well No. CP-1310-POD1, under this permit, shall be limited to 100.0 acre-feet per annum measured at the well.

3. The proposed new well is to be drilled by a driller currently licensed in the State of New Mexico.

4. An Artesian Well Plan of Operation shall be submitted and approved by the State Engineer before drilling is authorized for well No. CP-1310-POD1.

5. The driller's well record shall be filed with the Office of the State Engineer within 20 days after the well has been drilled or driven. Well record forms will be provided by the State Engineer upon request.

6. A totalizing meter of a type approved by and installed in a manner and at a location acceptable to the State Engineer shall be installed before the first branch of discharge line from well No. CP-1310-POD1. The District II Office of the State Engineer shall be advised of the make, model, serial number, date of installation, and initial reading of each of the meters prior to any appropriation of water under this permit.

7. The permittee shall record the meter readings in writing on the first day of each month of each year on a form acceptable to the State Engineer and submit said readings to the District II Office on or before the 10th day of that month for the previous calendar month. OSE File: CP-1310

NEW MEXICO OFFICE of the STATE ENGINEER APPLICATION FOR PERMIT TO APPROPRIATE UNDERGROUND WATERS

8. The permittee shall utilize the highest and best technology available to ensure conservation of water to the maximum extent practical.

9. This permit shall not be exercised to the detriment of valid existing water rights, shall not be contrary to the conservation of water within the State of New Mexico, and shall not be detrimental to the public welfare of the State of New Mexico.

10. The State Engineer shall retain jurisdiction over the permit.

ACTION OF STATE ENGINEER

Notice of Intentions Rcvd:		Date Rcvd. Corrected:	
Formal Application Rcvd:	03/27/2014	Pub. Of Notice Ordered:	04/21/2014
Date Returned - Correction:		Affidavit of Pub. Filed:	05/13/2014

This application is approved provided it is not exercised to the detriment of any others having existing rights, and is not contrary to the conservation of water in New Mexico nor detrimental to the public welfare of the state; and further subject to the specific conditions listed previously.

Witness my hand and seal this 21 day of January A.D., 2016

Tom Blaine, P.E., State Engineer

Bv: Andy Morley Mana

OSE File: CP-1310



STATE OF NEW MEXICO OFFICE OF THE STATE ENGINEER ROSWELL

TOM BLAINE, P.E. STATE ENGINEER DISTRICT II 1900 West Second St. Roswell, New Mexico 88201 Phone: 575-622-6521 Fax: 575-623-8559

January 22, 2016

Permit Nos. CP-1303 through CP-1314

Fulfer Oil and Cattle Company, L.L.C. and Fulfer Investments, L.L.C c/o Atkins Engineering and Associates, Inc. 2904 W. 2nd Street Roswell, NM 88201

Greetings:

Enclosed please find your copy of the above referenced applications for permits, which have been approved subject to the Specific Conditions of Approval attached thereon.

Sincerely,

Catherine Goetz Engineer Specialist Supervisor District II Office of the State Engineer

Enclosures cc Santa Fe MEMORANDUM OF RECON NDATION CP-1310 Page 1 of 19

MEMORANDUM OF RECOMMENDATION

DATE:	January 21,	2016
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FILE: CP-1310

TO: Andy Morley, District II Manager

THRU: Catherine Goetz, Engineering Specialist Supervisor

- FROM: Seng-Shi Deng, Water Resource Specialist
- **SUBJECT:** Application for Permit to Appropriate the Ground Waters of the State of New Mexico No. CP-1310
- APPLICANT: Fulfer Oil & Cattle Company, L.L.C. c/o Atkins Engineering Associates, Inc.

Point(s) of Diversion:				
WELL:	SUBDIVISION	SECTION	TOWNSHIP	RANGE
Proposed:				
CP-1310-POD1	Center 10 Acres of	25	25 S.	36 E.
	SE¼SE¼			
Place(s) of Use:				
Land owned by var	ious entities within Lea	county in		
SUBDIVISION	SECTION TO	WNSHIP	RANGE	

Purpose(s) of Use: Commercial and Industrial Purposes

1 - 36

Discussion:

All

Application for Permit to Appropriate No. CP-1310 was filed with the District II Office of the State Engineer by Atkins Engineering Associates, Inc. on behalf of the applicant, Fulfer Oil & Cattle Company, L.L.C. on March 27, 2014. The legal notice was advertised in the Hobbs News-Sun on April 27, May 4, and 11, 2014. The Affidavit of Publication was filed with this office on May 13, 2014.

21 S. - 26 S.

32 E. - 38 E.

The subject application was protested by Mr. Mike Stapleton on behalf of Gregory Rockhouse Ranch, Inc. on May 13, 2014. The protestant withdrew the protest and the file was remanded back to the District II for processing on November 19, 2015.

MEMORANDUM OF RECON NDATION CP-1310 Page 2 of 19

The applicant seeks a permit for appropriation from the Capitan Underground Water Basin by drilling and using proposed well numbered CP-1310-POD1 located on land owned by the applicant, in the center 10 acres of the SE¼SE¼ of Section 25, Township 25 South, Range 36 East, N.M.P.M. The 100.0 acre-feet per annum (Consumptive Use) of artesian groundwater from the Dockum Aquifer will be used for commercial and industrial purposes on land owned by various entities within Lea County in

SUBDIVISION	SECTION	TOWNSHIP	RANGE
All	1-36	21 S. – 26 S.	32 E 38 E.

The applicant seeks to drill proposed well numbered CP-1310-POD1 up to a depth of approximately 500 feet, with well casing of 13.375 inches in diameter.

The location of the proposed well is within the Capitan Underground Water Basin, approximately 1.0 mile southwest of the City of Jal, and approximately 1.1 mile west of State Highway 205, in Lea County, New Mexico.

The applicant has requested twelve new appropriations from within the Dockum Aquifer. Wells CP-1303-POD1 through CP-1314-POD1 are the requested points of diversion for these applications. Figure 1 shows the approximate locations of these requested points of diversion and nearby wells of other ownership. Figure 2 shows a close up view of the subject point of diversion, CP-1310-POD1.

	Case No. 15753 Division Exhibit No. 10
DATE	In 1900 SUSPENSE ENGINEER JONES JORGED IN 103 PUD PKURO814133527
h	NEW MEXICO OIL CONSERVATION DIVISION - Engineering Bureau - 1220 South St. Francis Drive, Santa Fe, NM 87505
	ADMINISTRATIVE APPLICATION CHECKLIST
	THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE
	[NSL-Non-Standard Location] [NSP-Non-Standard Proration Unit] [SD-Simultaneous Dedication] [DHC-Downhole Commingling] [CTB-Lease Commingling] [PLC-Pool/Lease Commingling] [PC-Pool Commingling] [OLS - Off-Lease Storage] [OLM-Off-Lease Measurement] [WFX-Waterflood Expansion] [PMX-Pressure Maintenance Expansion] [SWD-Salt Water Disposal] [IPI-Injection Pressure Increase] [EOR-Qualified Enhanced Oil Recovery Certification] [PPR-Positive Production Response]
[1]	TYPE OF APPLICATION - Check Those Which Apply for [A]
	[A] Location - Spacing Unit - Simultaneous Dedication are NSL NSP SD THER (OLDER) (in Lower Jatz UPER TRVRS)
	Check One Only for [B] or [C] [B] Commingling - Storage - Measurement DHC CTB PLC PC OLS OLM Swp-573 - 2
	[C] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery □ WFX □ PMX 🕱 SWD □ IPI □ EOR □ PPR
•	[D] Other: Specify
[2]	NOTIFICATION REQUIRED TO: - Check Those Which Apply, or Does Not Apply Does Not Apply [A] Working, Royalty or Overriding Royalty Interest Owners
	[B] 🔀 Offset Operators, Leaseholders or Surface Owner
	[C] X Application is One Which Requires Published Legal Notice
	[D] Notification and/or Concurrent Approval by BLM or SLO U.S. Bureau of Land Management - Commissioner of Public Lands, State Land Office
	[E] For all of the above, Proof of Notification or Publication is Attached, and/or,
	[F] Waivers are Attached
[3]	SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED ABOVE.

[4] **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

Note: Statement must be completed by an individual with managerial and/or supervisory capacity.

20 59 2008 Date Edd S. Title 10 Print or Type Name Signature @ leaco.net 5 eo.u o 4 e-mail Address

May 14, 2008

174

NMOCD Engineering ATTN: Will Jones 1220 S. Saint Francis Drive Santa Fe, NM 87504

RE: Fulfer Oil & Cattle LLC Maralo Sholes B #2 API 30-025-09806 C-108 Application

Mr. Jones:

Find within the new application as you suggested. We are refiling to inject into the lower Yates and 7 Rivers, all notices have been sent and advertised.

Should you have any questions, please call.

Sincerely,

Elen w ten

Eddie W. Seay, Agent Eddie Seay Consulting 601 W. Illinois Hobbs, NM 88242 (575)392-2236 seay04@leaco.net

cc: Fulfer Oil & Cattle

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, New Mexico 87505 FORM C-108 Revised June 10, 2003

RE.	
	APPLICATION FOR AUTHORIZATION TO INJECT
I.	PURPOSE: Secondary Recovery Pressure Maintenance X Disposal Storage Application qualifies for administrative approval? X Yes No
П.	OPERATOR: Fulfer Oil & Cattle LLC (OGRID-141402)
	ADDRESS:P.O. Box 578 Jal, NM 88252
	CONTACT PARTY: Eddie W. Seay PHONE: 575-392-2236
Ш.	WELL DATA: Complete the data required on the reverse side of this form for each well proposed for injection. Additional sheets may be attached if necessary.
IV.	Is this an expansion of an existing project? Yes X No If yes, give the Division order number authorizing the project:
V.	Attach a map that identifies all wells and leases within two miles of any proposed injection well with a one-half mile radius circle drawn around each proposed injection well. This circle identifies the well's area of review.
VI.	Attach a tabulation of data on all wells of public record within the area of review which penetrate the proposed injection zone. Such data shall include a description of each well's type, construction, date drilled, location, depth, record of completion, and a schematic of any plugged well illustrating all plugging detail.
VII.	Attach data on the proposed operation, including:
*VIII	 Proposed average and maximum injection pressure, Sources and an appropriate analysis of injection fluid and compatibility with the receiving formation if other than reinjected produced water, and, If injection is for disposal purposes into a zone not productive of oil or gas at or within one mile of the proposed well, attach a chemical analysis of the disposal zone formation water (may be measured or inferred from existing literature, studies, nearby wells, etc.). Attach appropriate geologic data on the injection zone including appropriate lithologic detail, geologic name, thickness, and depth. Give the geologic name, and depth to bottom of all underground sources of drinking water (aquifers containing waters with
	total dissolved solids concentrations of 10,000 mg/l or less) overlying the proposed injection zone as well as any such sources known to be immediately underlying the injection interval.
IX.	Describe the proposed stimulation program, if any.
*X.	Attach appropriate logging and test data on the well. (If well logs have been filed with the Division, they need not be resubmitted).
•XI.	Attach a chemical analysis of fresh water from two or more fresh water wells (if available and producing) within one mile of any injection or disposal well showing location of wells and dates samples were taken.
XII.	Applicants for disposal wells must make an affirmative statement that they have examined available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zone and any underground sources of drinking water.
XIII.	Applicants must complete the "Proof of Notice" section on the reverse side of this form.
XIV.	Certification: I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.
	NAME: Eddie W. SeayTITLE: Agent
	SIGNATURE: SIGNATURE: 5/9/2008
	E-MAIL ADDRESS: <u>seav04@leaco.net</u> If the information required under Sections VI, VIII, X, and XI above has been previously submitted, it need not be resubmitted.

DISTRIBUTION: Original and one copy to Santa Fe with one copy to the appropriate District Office

ATTACHMENT TO APPLICATION C-108

Maralo Sholes B #2 Unit P, Sect. 25, Tws. 25 S., Rng. 36 E. API: 30-025-09806 Lea Co., NM

III. WELL DATA

- A. 1) See injection well data sheets and attached schematics.
 - 2) See injection well data sheets and attached schematics.
 - 3) 3 1/2" plastic coated tubing.
 - 4) Baker AD-1.
- B. 1) Injection formation is the Lower Yates and 7 Rivers.
 - 2) Injection interval 2938' to 3055'.
 - 3) Well was drilled as a producer.
 - 4) The next higher producing zone, none, the base of salt at approximately 2562'. The next lower producing zone is the Queen at approximately 3400', but is non-productive.
- IV. NO.
- V. MAP ATTACHED.

VI. LIST OF WELLS AND DATA ATTACHED.

- VII. Fulfer proposes to re-complete the above listed well. Clean out well bore, squeeze existing perfs and recomplete in Lower Yates and open hole in 7 Rivers from 2938' to 3055'. Run 3 1/2" plastic coated tubing with 3 1/2" packer and set at approximately 2850'.
 - 1) Plan to inject approximately 5000 bpd of produced water from Fulfers own operation and surrounding production of the same waters.
 - 2) Closed system.
 - Average injection pressure should be approximately 500# to 700# or whatever limit OCD allows.
 - 4) Only produced water from formation in this area.

VIII. See Attached.

There is no fresh water found for this area of review. Sample of water well in Section 26 was obtained, see attached.

IX. ACID AS NEEDED.

X. PREVIOUSLY SUBMITTED TO OCD.

XI. ATTACHED.

XII. I, Eddie W. Seay, have examined all available geologic and engineering data and find no evidence of open faults or any other hydrologic connection between the disposal zones and any underground source of drinking water pertaining to this well.

XIII. ATTACHED.

INJECTION WELL DATA SHEET Side 1 OPERATOR: Fulter oil + Cattle Co LLC WELL NAME & NUMBER: March Show B 2.5 P WELL LOCATION: 1260/5 660/E FOOTAGE LOCATION 25 36 UNIT LETTER SECTION RANGE TOWNSHIP WELLBORE SCHEMATIC WELL CONSTRUCTION DATA Surface Casing FORM IDEPT Hole Size: 13 Casing Size: 103 @ 410 or ft³ Cemented with: (50 sx sx. ALMAT TAN-Y-TR ICH 2871-2918 sez 76 s ALMATTAN-Y-TR (GAS) Method Determined: Color Top of Cement: Surlaw Intermediate Casing I 64 @ 122 Hole Size: Casing Size: or ft³ Cemented with: sx. Top of Cement: Method Determined: **Production Casing** Hole Size: 7 @ 2935 7 6 2936" or ft³ Cemented with: 150 st sx. Top of Cement: 1241 Method Determined: Colculat Total Depth: 2955 1 Injection Interval PREPARED BY: UPDATED 2938 feet to 3055 Eddle Seay (Perforated or Open Hole) indicate which)
INJECTION WELL DATA SHEET

Tubing Size: 32 Lining Material: IPC	
Type of Packer: Baker AD - 1 Packer	
Packer Setting Depth: 2850 ft.	
Other Type of Tubing/Casing Seal (if applicable): NONE	
Additional Data	
1. Is this a new well drilled for injection?Yes _XNo	
If no, for what purpose was the well originally drilled? well was originally	
dvilled and produced from Jalmat Gas	
2. Name of the Injection Formation: Lower Yate - 7 Rivers	
3. Name of Field or Pool (if applicable): Jalmat (Yate, Tansil - 7R) Gas Pool	
4. Has the well ever been perforated in any other zone(s)? List all such perforated intervals and give plugging detail, i.e. sacks of cement or plug(s) used.	
2871 5 2910 and Squeezed, and is presently perforted from 2733-2	.824
5. Give the name and depths of any oil or gas zones underlying or overlying the proposed injection zone in this area:	
The upper yates and salt seefin is above 2562 to 2824 Lowen zone and the Queen 3400 No production.	

Side 2





				C. Manager and Conception of C
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-				
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on	Chevron Std Pro	Apache Elikopa Oes (Lc-e)	Elkhorn Otsi A1 el'Tex.Poci	D. Hartman Mag
:0n 308	Chevron Stid Pro Columbian Carbor 101371	Apache Eldon Oeg (Lc-+) D/R A-167 A (Lc-+) HBP (Chalfanty Merge Eldon Oeg	Elkhon 0k3 eral 3500 t 5 Mess inflow 2 Pet (60)	D. Hartman Wag
оп 208	Chevron Stid Pro Columbian Carbor Posso Amerada H.B.P.	Apache D/R HBP IChalforn verge IChalforn verge IChal	Eikhoniùsi trai ti 3500 5 Mess "Stoles" Pet. (a) Pet. (a)	D. Hartman Wildy
00 30 <i>8</i>	Chevron Std Pro Columbian Carbor Posse Amerada H.B.P. 0301778	Apache D/R HBP Chalfarr, verso IChalfarr, ve	Elkhoniùsi trai to 3500 5 Mess "Sholes" Pet. (a) Morolo Alexandro de la contractione Pet. (a) Alexandro de la contractione Pet. (a) Alexandro de la contractione Alexandro de la contractione Pet. (a) Alexandro de la contractione Pet. (a) Alexandro de la contractione Alexandro de la contract	D. Hariman Strices. "D' Yourn Humm (I. A. 13.31.2004 Davidson) 14.6.2002 S/R
on Soð	Chevron (Std Pro Columbian Carbor (Prom) Amerada H.B.P. 0301778	Apache Elkorn Old (Lc-e) D/R 4187 (Lc-e) HBP Image: Image in the state i	Elkhoni Olsi train to 35000 5 Mess Shales Morolo Castra Castra Morolo Castra Morolo Castra Morolo Castra Morolo Castra Morolo Castra	D. Hartmen Stratt "B' hum Hunted Ovidson) 14.6.2002 SVR D. Hartmen
ion boð	Chevron Stid Pro Columbian Carbor Possed Amerada H.B.P. 0301778	Apache D/R HBP Chalfarry Werks IChalfarry Werks IChalfarry Werks IChalfarry Werks IChalfarry Werks HBP IChalfarry Werks IChalfarry Werks IChalfar	Elkhoni Olsi train to 35000 5 Mess Shales Morolo 1 Tex Poci Inflow 2 Pet. (a) 1 Tex Poci (a) Pet. 1 Tex Poci (a) 1 Tex Poci (a) Pet. 1 Tex Poci (a) 1 Tex Poci (b) 1 Tex Poci (c) 1 Tex Poci (c)	D. Hariman (Mag) "B Your Mundis Oavidson) 13.11.2002 S/R D. (178) Hertman 3
ion boð	Chevron Stid Proc Columbian Carbor Possed Amerada H.B.P. 0301778 35 Marathon	Apache Elkorn Old (Lc-e) D/R HBP III A III A LChalfarr HBP IEIkhon Old IEIkhon Old IChalfarr Variation HBP HBP IChalfarr Variation HBP HBP IChalfarr Variation HBP HBP IBI 32 Schetter IBI 32 Schetter HBP HBP HBP HBP HBP IBI 32 Schetter IBI 32 Schetter III 32 HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP HBP </th <th>Elikhoni ülsi train to 35001 5 Mess Shales Morolo 1 Tex Poci Inflow 2 Pet. 10 Pet. 10 Pet. 1</th> <th>D. Hariman (100) "B'hum Munty Davidson) 13.31-2004 S/R D. (178) Hertman 3</th>	Elikhoni ülsi train to 35001 5 Mess Shales Morolo 1 Tex Poci Inflow 2 Pet. 10 Pet. 10 Pet. 1	D. Hariman (100) "B'hum Munty Davidson) 13.31-2004 S/R D. (178) Hertman 3
ion boð	Chevron 15td Pro Columbian Carbor 10007 Amerada H.B.P. 0301778 35 Marathon 12:1-2009 1 10664	Apoche Elikorn OLG L(L - +) D/R And e-181 A L(L - +) HBP Chalforn Versig IEILING OLG 1.1 201 IEILING OLG 1.1 201 IEILING OLG 1.1 201 IEILING OLG 1.1 201 IEILING 1.1 IEILING IEIL	Elkhon üldi elihon üldi elihon is Mess Stales R Level 3 Morodo Stales Concho Res, staliz 2121-2006 220 51 22 2122 Act of 10 20 2122 Act	D. Hariman Kiao B Yuum Munta Oavidson S/R D. (178) Hertman 3 Hertman 3 Hertman 3 Hertman 3 Hertman
ion boð	Chevron 15td Pro Columbian Carbor 1057 Amerada H.B.P. 0301778 35 Marathon 12:+1-2009 101614 3422	Apache Elkorn OLG ILC - e1 D/R Amache Elkorn OLG ILC - e1 HBP IChelform Verify IElkorn OLG 3 - 1 201 Verify IElkorn OLG Fikhorn OLG Verify IElkorn OLG Verify 6:934 181.32 see, etch. Ielower 6:934 8.324 I Southwest Verify IBI 32 see, etch. Ielower VB: 865 ILC - e1 Verify Ielower VB: 965 IBI 32 see, etch. Ielower VB: 805 NBP C '3.50 Southwest VB: 805 NBP C '3.50 Static	Elkhon ülsi elihon ülsi elihon is Mess Morolo El Concho Res. 97312 Concho Res. 97312 2 121-2006 200 1 100 1 Gruy Petrioon 2 121-2006 200 1 100 1 Gruy Petrioon Burleson 1 17 ex. Poct 1 17 ex.	D. Harman King) B. Divin Notion Cl. A. Subin Notion Covidson) 13.31.2002 S/R D. (178) Hertman 3 F71
ion boð	Chevron 15td Pro Columbian Carbor 1057 Ameradu H.B.P. 0301778 1 35 Marathon 12.1-2009 1 101614 3429 1	Apache Elkorn OLG ILC - e1 D/R ILC + IE Internet ILC - e1 ILC - e1 HBP IChel Farm, Variagi IEI Standard ILC - e1 1 B1 3: 1:0:00 ISI 3:0:00 IEI Standard 6:934 IB1 3:0:00 ISI 3:0:00 ISI 3:0:00 VB: 665 ILC - e1 ISI 3:0:00 ISI 3:0:00 Filkborn 0EG IB1 3:0:00 ISI 3:0:00 ISI 3:0:00 VB: 655 ISI 3:0:00 ISI 3:0:00 ISI 3:0:00 VB: 855 IBB 934 ISI 3:0:00 ISI 3:0:00 R Lowge' IEIkhorn 0:0:00 ISI 3:0:00 ISI 3:0:00 R Lowge' IEIkhorn 0:0:00 ISI 3:0:00 ISI 3:0:00	Elkhon OLSI erain to a sine sine sine sine sine sine sine sine	D. Harman Man. B. Divin Harting Cl. A. Shum Harting Covidson) 13.31.2002 S/R Devidson) 14.46.2002 S/R D. (1780) Hertman 3 Covidson) 14.46.2002 S/R D. (1780) Hertman 3 S/R D. (1780) Hertman 3 S/R D. (1780) Hertman 3 S/R D. (1780) S/R D. (1780) S/R
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6 <i>thony_etal(S)</i> (hesopeoke 12 - 1 - 2008 101615 4020	Chevron 15td Prog Columbian Carbor (D377) Amerada H.B.P. 0301778 100614 3420 100614 3420 100614 3420 100614 3420 100614 3420 100614 100614 100614 3420 100614 100614 100614 100614 100614 100614 1007 112010 100614 1007 112010 100614 1007 112010 1007 112010 1007 112010 1007 1007	Apache D/R HBP IChelform Very III (LC-e) HBP IChelform Very III (LC-e) NB Elkhorn 0tig 181 32 181 32 Karpon 181 32	Elkhon Old Elkhon Old Elkhon Old Shales Norolo Shales Norolo Shales Norolo Shales Norolo Shales Norolo Shales Norolo Shales	D. Harmen Steam B. Harmen Steam B. Hum Hum St Cl. A. Social Covidson) 12.15.2002 Srin B. Hum Hum St B. Hum Hum St B. Hum Hum St Srin B. Hum Hum St Srin B. Hum St Starts
6 <i>thony_etal(S)</i> (hesopeoke 12 - 1 - 2008 101615 4020	Chevron 15td Prog Columbian Carbor (D377) Amerada H.B.P. 030177B 35 Marathon 12.1-2009 101614 3420 Jay Anthony, etal, (5) Canoco- Devon Ener Conoco- Phillips 7.1-2010 Phillips E. 1924 \$7773 E.1924 Devon T Chevron T Taxaa Ener, Y8-703 E.1924 Devon T Chevron T Taxaa Ener, Y8-703 B.243 B-158 57778 Devon Ener. Y8-703 B.243 B-158 77.1-2010 H B P H.B P. V8-703 B.243 B-158 2000 Ener. HBP H.B P. V8-703 B-243 B-158 Devon Ener. Y8-703 B-243 B-158 ConocoPhillips Devon Ener. Y8-703 B-243 B-158 27778 Devon Ener. Y8-703 B-243 B-158 27778 Devon Ener. Y8-703 B-243 B-158 1000 Devon Ener. Y8-703 B-243 B-158 1000 Devon Ener. Y8-703 B-703 B-703 B-703 E-1924 Y8-703 B-703 B-70	Apache D/R HBP IChelform Very III (LC-e) HBP IChelform Very III (LC-e) NB 65 IChelform Very III (LC-e) NB 65 IChelform Very III (LC-e) NB 65 IChelform Very III (LC-e) NB 65 ISH 181 25 ISH 181 25 ISH 181 25 ISH 200 VB 855 NB 75 ISH 200 VB 855 NB 75 ISH 200 ISH	Elkhon Old Elkhon Old Elkhon Old Elkhon Old States Morolo States Morolo Tarne American Concho Res. 97312 2 States States States Morolo Tarne American Concho Res. 97312 2 States Morolo Tarne American States Morolo Tarne American States Morolo Tarne American States Morolo Tarne American States Sta	D. Harman King: B. Jun Budit G. A. South South South Devidson) 12.1:2002 SrR Devidson) 12.1:2002 SrR Devidson) 12.1:202 SrR Devidson) 12.1:202 SrR Devidson) 12.1:202 SrR Devidson) 12.1:202 SrR Devidson) 12.1:202 SrR Devidson) 12.1:202 SrR SrR States
6 <i>thony_etal(s)</i> <i>Chesopeake</i> 12-1-2008 101615 4020	Chevron 15td Proc Columbian Carbor 103374 Ameradu H.B.P. 0301778 100614 3489 100614 3489 100614 3489 100614 3489 100614 3489 100614 3489 100614 3489 100614 100614 100614 1007 100614 1007 100614 1007 1007 100614 1007 1007 1007 1007 1007 1007 1007 10	Apache Elkorn OLG ILC-e1 D/R IAP ILC-e1 ILC-e1 HBP IChelfant, terring IELand, terring IELand, terring IBP ISA ISA IELand, terring IELand, terring Elkhorn OLG VB-865 IChelfant, terring IELand, terring IELand, terring 6:934 IBI 32 sea, terring IELand, terring IELand, terring VB-865 IBI 32 sea, terring IELand, terring IELand, terring VB-865 IBI 23 IB-344 IELAND, terring IELAND, terring VB-865 IBI 24 IB-344 IELAND, terring IELAND, terring VB-865 IBI 25 IB-344 IELAND, terring IELAND, terring VB-865 IBI 25 IB-344 IELAND, terring IELAND, terring VB-865 IBI 25 IB-344 IELAND, terring IELAND, terring VB-865 IB-327 II IELAND, terring IELAND, terring J.A.Arthany(S) IELAND, terring IELAND, terring	Elkhon Old en	4. D. Hartman (Han): B. Divin Harting: Cl. A. Store Dovidson) 12. 15.2025 SrR D. (Triss) Hertman 3. 0. (Triss) Hertman 3. 5. 1. (Triss) SrR 5. 5. 5. 5. 5. 5. 5. 5. 5. 5.
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DISPOSAL WELL

DIOI OOME WELL														_		_
API #	PROPERTY NAME	#	OPERATOR	TD	TYPE	STATI	со	LAND	U/L	SEC	TWN	RNG	N/S	E	E/W	
30-025-09806	MARALO SHOLES B	2	FULFER OIL & CATTLE LLC	3055		ТА		F	Ρ	25	25 S	36 E	660	s	660	E

Wells within 1/2	mile of the proposed disposal	well.												5280	528	0	-
API#	PROPERTY NAME	#	OPERATOR	TD	TYPE	STAT	co	LAND	U/L	SEC	TWN	RNO	6	N/S	E/W		Distance /
30-025-09809	SHOLES B 25	3	CONOCOPHILLIPS COMPANY	3035		P&A		F	I	25	25 5	5 3	6 E	1980 S	66	0 E	1320
30-025-09812	SHOLES B 25	1	SOUTHWEST ROYALTIES INC	2950	A	CTI	re	F .	H	25	25 5	5 3	6 E	2310 N	1 99	0 E	2333
30-025-09815	HUMPHREYS		FULFER OIL & CATTLE LLC	3255		TA .		Р	N	25	25 5	5 3	6 E	330 S	231	0 W	2333
30-025-09816	SHOLES B 25	1	MARALOLLC	3220		P&A		F	0	25	25 5	5 3	6 E	660 S	183	0 E	1170
30-025-09817	HUMPHREYS	2	MARALO LLC	3222		P&A-		Р	K	25	25 5	5 3	6 E	1650 S	231	0 W	2513
30-025-09819	SHOLES B 25	3	MARALOLLC	3220		P&A		Р	J	25	25 5	5 3	6 E	1980 S	183	0 E	1763
30-025-09830	HUMBLE STATE	2	SOUTHWEST ROYALTIES INC	3006		P&A		S	Н	36	25 5	5 3	6 E	1980 N	1 66	0 E	2640
30-025-09831	HUMBLE STATE	3	MARALOLLC	2950		P&A		S	A	36	25 5	5 3	6 E	660 N	1 66	0 E	1320
30-025-09833	SHELL A STATE	1	MARALO INC	3138		P&A		S	В	36	25 5	5 3	6 E	660 N	1 198	0 E	1866
30-025-11852	SHOLES B	4	MARALOLLC	3105		P&A		F	D	31	25 5	5 3	7 E	510 N	33	0 W	1532

API	WELL NAME	OPERATOR	FTG NS	NS CD	FTG EW	EW CD	OCD ISD	VISe	Tsn	Rite	TVD DEPTH	OGRID CDE	PROPERTY	LANWE		CACRES	SPUD DATE	COMPL STAT
3002509804	BROWN 001	FULFER OIL & CATTLE LLC	1980	N	2310	E	FF	- 000	25 255	36E	3406	141407	29160	PG		1 160	SFUD DATE	Active
3002509807	BROWN 005	FULFER OIL & CATTLE LLC	1650	N	990	W	EE		25.255	36E	3280	141402	29160	s s		1 40		Active
3002509808	SHOLES B 25 002	SOUTHWEST ROYALTIES INC	660	N	1980	E	B B		25 255	36E	3375	21355	18085	F S	900-05-06-0 ATE 6 C (C (C (1990)) C (1990)	1 40	ļ	Active
3002509818	BROWN 003	FULFER OIL & CATTLE LLC	365	N	1650	w	c c		25 258	36E	3225	141402	29160	PO		1. 40	02-May-60	Active
3002509820	BROWN 004	FULFER OIL & CATTLE LLC	1690	N	1870	w	FF		25 255	36E	3247	141402	29160	PO	· · · · · · · · · · · · · · · · · · ·	1 40	06-Aug-60	Active
3002509823	BROWN 002	FULFER OIL & CATTLE LLC	330	N	825	w	D D	-	25 258	36E	3321	141402	29160	PO		1 40	18-Dec-59	Active
3002511854	DYER 002	INFLOW PETROLEUM RESOURCES LP	735	N	980	E	A A		31 258	37E	3440	225789	33728	PO	A A DA GA CA	1 40	16-Jul-75	Active
3002511854	DYER 002	INFLOW PETROLEUM RESOURCES LP	735	N	980	E	A A		31 255	37E	.3440	225789	33728	PO		1 40	16-Jul-75	Active
3002511858	LEGAL 003	CIMAREX ENERGY CO OF COLORADO	330	S	1980	E	0 0		31 255	37E	3336	162683	21831	PO		2 200	18-Oct-51	Active
3002511857	M F LEGAL 002	CIMAREX ENERGY CO OF COLORADO	1980	S	660	E	1 1	1 :	31 258	37E		162683	21767	P G		2 200		Active
3002528289	M F LEGAL 005	CIMAREX ENERGY CO OF COLORADO	330	S	330	E	P P	1	31 255	37E	3350	162683	21767	P G		1 160	29-Jul-83	Active
3002511855	DYER 003	INFLOW PETROLEUM RESOURCES LP	1650	N	330	E	н н	The based of the	31 255	37E	2968	225789	33728	P G		1 160	10-May-76	Active
3002509812	SHOLES B 25 001	SOUTHWEST ROYALTIES INC	2310	N	990	E	H H		25 258	36E	2950	21355	18085	FO		40		Active
3002535223	SHOLES B 30 003	INFLOW PETROLEUM RESOURCES LP	1806	N	815	W	E 2		30 255	37E	3000	225789	33755	FO		1 39.79	05-Jan-01	Active
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JALMAT; TAN-YATES-7 RVRS (GAS)	25	S	37 E			2007-12	330	32149	36399	0)	4179	5156

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Geology

The proposed disposal interval is in the lower 40 feet of the Yates Formation and in the Upper 80 feet of the Seven Rivers Formation. The Yates is a dolomitic sandstone and the upper Seven Rivers consists of dolomite with some interbedded sandstone. As is shown by the structure maps on the Yates, Seven Rivers and Queen formations and the schematic section indicates that the Capitan Reef lies 1.5 miles to 3.0 miles west of the proposed disposal well. The injection into the lower Yates and upper Seven Rivers will not have any impact on the reef.

Page 1 of 1

Jones, William V., EMNRD

From:Kautz, Paul, EMNRDSent:Friday, May 16, 2008 2:44 PMTo:Jones, William V., EMNRDSubject:Fulfer SWD revised application

Will

Eddie Seay was in my office this mourning. He gave me a copy of the revised Fulfer Sholes B #2 application. He asked me to review it per your request in your last e-mail. I reviewed the geology and the structure maps correspond real close to some old GEOMAP structure maps I have and to maps in the Roswell Geologic society Field maps for southeastern New Mexico. I also looked several logs online and at the Xerox copy of a log he is submitting with the application. I agree that the reef is not present in the area of the proposed disposal. I agree the Reef is probably at least a mile or more to the west. The Capitan reef is younger than the Queen formation and therefore probably is not present vertically below the well.

If you have any questions call or e-mail me.

Paul Kautz



Schematic section

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Structure Top on Seven Rivers Formation

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Structure Top of Queen

C.I. = 100'

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Schlumberger NEUTRON LOG		
COMPANY CONOCO. INC.		
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COUNTY LEA STATE NEW MEXICO		
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Approved by Conditions of approval, if any, are certify that the applicant holds lega which would entitle the applicant to	attached. Approval of this notice does not of concurrent of the su conduct operations thereon.	Title warrant or object lease Office	Date	÷
Title 18 U.S.C. Section 1001 and Ti States any false, fietitious or fraudul	tle 43 U.S.C. Section 1212, make it a crime and statements or representations as to any ma	for any person knowingly and will atter within its jurisdiction.	fully to make to any department or agency of the United	
(Instructions on reverse)	1	,		

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Form 3160-5 (September 2001)	UNITED STATES DEPARTMENT OF THE INTERIOR	FORM APPROVED OMB No. 1004-0135 Expires January 31, 2004
SUNDR	Y NOTICES AND REPORTS ON WELLS	5. Lease Serial No. <i>LC 0 32581-(b)</i>
Do not use the abandoned we	is form for proposals to drill or to re-enter an all. Use Form 3160-3 (APD) for such proposals.	6. If Indian, Allottee or Tribe Name
SUBMIT IN TR	IPLICATE - Other instructions on reverse side	7. If Unit or CA/Agreement, Name and/or No.
Oil Well Gas Well	Other	8. Well Name and No. Sholes 'R' No Z
Southwest Rage	this, Inc.	9. API Well No.
P.D. Box 11390 Mil	3b. Phone No. (include area code) 432-686-99927	30-025-09806 10. Field and Pool, or Exploratory Area
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14 P Sec. 25	TZSS, R3LE	Lea. Non
12. CHECK AP	PROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, R	EPORT, OR OTHER DATA
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 Notice of Intent Subsequent Report Final Abandonment Notice 	Acidize Deepen Production (Star Alter Casing Fracture Treat Reclamation Casing Repair New Construction Recomplete Change Plans Plug and Abandon Temporarily Ab Convert to Injection Plug Back Water Disposal	t/Resume) Water Shut-Off Well Integrity Other andon
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	Form approved, Budget Burran No. 1004-0115
(November 1984) (Formerly 9–331) BUREAU OF LAND MANAGEMENT	LC.032581 (b).
SUNDRY NOTICES AND REPORTS ON WELLS (Do not use this form for proposals to drill or to deepen or plug back to a different reservoir. Use "APPLICATION FOR PERMIT" for such proposals.)	6. IF INDIAN, ALLOTTKE OK TBIBE NAME
1.	7. UNIT AGREEMENT NAME
NAME OF OPERATOR	8. FARM OR LEASE NAME
Maralo, Inc.	Sholes "B"
P.O. Box 832, Midland, TX 79702 4. LOCATION OF WELL (Report location clearly and in accordance with any State requirements."	2 10. FIELD AND POOL, OB WILDCAT
660' FSL & 660' FEL	COOPER - JA
14. PERMIT NO.	Sec. 25, 25-S, 36-E 12. COUNTY OB PARISH 13. STATE
<u>3021</u> GL	Lea NM
18. Check Appropriate Box To Indicate Nature of Notice, Report, or C	Other Data
NOTICE OF INTENTION TO : BUBBEQU	SENT REPORT OF:
TEST WATER SHUT-OFF PULL OR ALTER PUSING WATER SHUT-OFF	REPAIRING WELL
PRACTURE TREAT SULTIFICE CONFFETE PRACTURE TREATMENT	ALTERING CASING
REPAIR WELL CHANGE PLANE (Other)	
(Other) Convert to Water Source Well X Completion or Recoupt 17. DESCRIPTE PROPOSED OR CONFLETE: OF ERATIONS (Clearly state all pertinent details, and give pertinent dates, proposed work. If well is directionally drilled, give subsurface locations and measured and true vertice nent to this work.)*	of multiple completion on Well etion Report and Log form.) including estimated date of starting any al depths for all markers and zones perti-
Well has reached its economic limit. The last test was 1/2 BO; We propose to convert to water source well for Jalmat Waterflood	20 BW and 30 MCF gas. Unit.
Proposed Operation	
 RUPU cement squeeze Yates perforations 2733 - 2824'. WOC. Pout to T. D. Deepen approximately 50'. Set RTTS @ 2830' and acid treat open hole w/2500 gals 15% HO Run Centrilift Variable Speed 125 HP series 544 submersible Lay water line and pump water to Jalmat Unit. 	Pull equipment. Clean 21 acid. pump.
	RECEIVED
	MAY 1 6 1986
18. I hereby certify that the foregoing is true and correct	HOBBS, NEW MEXICO
SIGNED Brenda Collingon both The - Agent	DATE 5/15/86
(This space for Federal or State office use)	
APPROVED BY ACT (Lamm TITLE TITLE	DATE 6-19.84
Subject to	
Like Approval	
Title 1998. Station 1001, makes it a crime for any person knowingly and willfully to make to United States any laise, fictutious or fraudulent statements or representations as to any matter w	any department or agency of the ithm its jurisdiction.

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(Rev. 5-63)			CTATEC	SUBMI	T IN DUPLI	CA The	Form	approved.
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2955		2832	How	-			X	
24. PRODUCING INTER	TYAL(S), OF THIS	COMPLETION- TO	P, BOTTOM, NAME ((MD AND TVD)*				25. WAS DIRECTIONAL SUBVEY MADE
2733 - 2824	' Upper Ya	tes				AC	CEPTED FOR REC	ORD
26. TIPE ELECTRIC	AND OTHER LOGS)	RUN				P	ETER W. CHES	FER WELL COBED
-			:				111N 2 8 108	p
28.		CAS	ING RECORD (Re	wurt ull strings	set in well)	1	JUN 1 4 130	C f rear
CARING SITE	WEIGHT 18/	PT LEPTH SI	et (MD) I B	OLE SITE	C	ENENTING	RECORD	I ANGUNT DULL
CASING SIZE	WEIGHT, LB./	FT. ()EPTH 6	D'	OLE SIZE	150 cr	U.S.	GEOLOGICAL SL	NEVEN OUNT PULLED
10 3/4"	WEIGHT, L8./	FT. (ФЕРТН 6) 41 293	ет (MD) - н О ¹ 5 [.] .	OLE SIZE	150 sx 150 sx	U.S. RO	GEOLOGICAL SU	X CO
<u>10 3/4"</u>	WEIGHT, LB./	<u>FT.</u> 	ет (мо), - Г н 0 ¹ 5 ¹ .	OLE SIZE	150 sx 150 sx	U.S. RO	GEOLOGICAL SU	X CO
<u>10 3/4"</u>	WEIGHT, L8./	FT. 055771 64 41 293	ет (мо) , / н 0' 5'.	OLE SIZE	150 sx 150 sx	U.S. RO	GEOLOGICAL SU	X CO
<u>CASING SIZE</u> <u>10 3/4"</u> <u>7"</u> 29.	TOP (ND)	FT. DEFTH 64 41 293 LINER RECORD	er (ND) / ' H Q' 5'.		150 sx 150 sx 30.	U.S. RO	TUBING RECORD	XCO
<u> (ASING SIZE</u> 10 3/4" 7" 29. SIZE	WEIGHT, L8./	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD)	ET (MD)	OLE SIZE	150 sx 150 sx 30. 30. 30.		TUBING RECORD DEPTH BET (MD) 2800	PACKER BET (MD)
<u> (ASING SIZE</u> <u> 10 3/4"</u> <u> 7"</u> 29. <u> SIZE</u>	WEIGHT, L8./	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD)	er (MD) / H 0'	ULE SIZE	150 sx 150 sx 30. 30. 312 2	U.S. RO 3/8''	TUBING RECORD DEPTH BET (MD) 2800	PACKER BET (MD)
CASING SIZE 10 3/4" 7"	TOP (MD)	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD)	ET (MD)	OLE SIZE	150 sx 150 sx 30. 30. 30. 30. 30. 30. 30. 30.	EVENTING U.S. RO 3/8''	TUBING RECORD DEPTH BET (MD) 2800	PACKER SET (MD)
CASING SIZE 10 3/4" 7" 29. 31. PERFORATION REG 4" cased gun	TOP (MD) CORD (Interval, #1) WEIGHT, L8./	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) See and number) from 2733'	to 2824'	SCREEN (MI SCREEN (MI SCREEN (MI SCREEN (MI	150 sx 150 sx 30. 30. 30. 30. 30. 30. 30. 30.	E SI	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF	PACKER BET (MD)
CASING SIZE 10 3/4" 7" 29. 31. PERFORATION REG 4" cased gun (30 shots)	TOP (MD) TOP (MD) CORD (Interval, sin W/1 JSPF	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) See and number) from 2733'	ET (MD) / H 0' 5'. SACKS CEMENT* LO 2824'	SIZE SCREEN (MI 32. DEPTH INT 2733*	150 sx 150 sx 30. 30. 30. SIZ 2 3 ACID. SHO ERVAL (MD) - 2824 '	U.S. RO 3/8" 1, FRAC	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF DO gals 15% H	PACKER BET (MD) ULEEZE, ETC. MATERIAL USED HC1 acid
CASING SIZE 10 3/4" 7" 28. 31. PERFORATION REC 4" cased gum (30 shots)	TOP (MD)	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) From 2733'	ET (MD) / H 0' 5'. SACKS CEMENT' to 2824'	SIZE SCREEN (MI 32. DEPTH INT 2733*	150 sx 150 sx 30. 30. 30. ACID, SHO ERVAL (MD) - 2824'	E	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF DO gals 15% H	PACKER BET (MD)
CASING SIZE 10 3/4" 7" 29. 31. PERFORATION REC 4" cased gun (30 shots)	TOP (MD) CORD (Interval, #1. W/1 JSPF	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) cc and number) from 2733'	to 2824'	SCREEN (MI SCREEN (MI 32. DEPTH INT 2733'	150 sx 150 sx 30. 30. 30. Cline Structure ACID, SHO ERVAL (MD) - 2824 '	E	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF DO gals 15% H	PACKER BET (MD) ULEEZE, ETC. MATERIAL USED HC1 acid
CASING SIZE 10 3/4" 7" 29. 31. PERFORATION REG 4" CASED GUT (30 shots) 33.*	TOP (MD) TOP (MD) CORD (Interval, st. W/1 JSPF	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) See and number) from 2733'	ET (MD)	SCREEN (MI 32. DEPTH INT 2733*	150 sx 150 sx 30. 30. 30. 2 3 ACID. SHO ERVAL (MD) - 2824 '	U.S. RO 3/8" 1, FRAC	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF DO gals 15% H	PACKER BET (MD) ULEEZE, ETC. MATERIAL USED HC1 acid
CASING SIZE 10 3/4" 7" 29. 31. PERFORATION REC 4" CASED GUT (30 shots) 33.* DATE FIRST PRODUCT 11 7 81	TOP (MD) TOP (MD) COED (Interval, state W/1 JSPF 10N Proof	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) Sc and number) from 2733'	ET (MD) , , , , , , , , , , , , , , , , , , ,	SCREEN (MI 32. DEPTH INT 2733'	150 sx 150 sx 30. 30. 30. 30. 2 : ACID, SHO ERVAL (MD) - 2824 ind type of p	U.S. RO 3/8" T, FRAC	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF DO gals 15% H	PACKER BET (MD) PACKER
CASING SIZE 10 3/4" 7" 29. 31. PERFORATION REG 31. PERFORATION REG 4" cased gun (30 shots) 33.* 23.* 11-7-81 DATE OF TEST	TOP (MD) TOP (MD) CORD (Interval, st. W/1 JSPF ION FLODI 211 HOURN TESTED	FT. DEFTH 64 41 293 LINER RECORD воттом (MD) cc and number) from 2733' (CTION METHOD (<u>x 1¹2'' x 12</u> CHOKE SIZE	ET (MD)	SCREEN (MI SCREEN (MI	Cl 150 sx 150 sx 30. 30. 30. 2 . ACID, SHO ERVAL (MD) - 2824 ' 100 type of p	E	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF DO gals 15% H	PACKER BET (MD) PACKER BET (MD) UEEZE, ETC. MATERIAL USED HC1 acid
CASING SIZE 10 3/4" 7" 29. 31. PERFORATION REG 4" CASED GUT (30 shots) 33.* DATE FIRST PRODUCT 11-7-81 DATE OF TEST 11-9-81	TOP (MD) TOP (MD) CORD (Interval, st. W/1 JSPF ION PRODI HOURS TESTED 24	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) From 2733' from 2733' CTION METHOD (X 112'' X 12 CHOKE SIZE	ET (MD) , I'' H O' 5J. SACKS CEMENT* LO 2824' TO 2824' TO 2824' TO 2824' TO 2824' TO 2824'	SCREEN (MI SCREEN (MI 32. DEPTH INT 2733* DEPTH INT 2735* DEPTH INT 2735* DEPTH INT 2755* DEPTH INT 2755* D	Cl 150 sx 150 sx 30. 30. 2 3 ACID, SHO ERVAL (MD) - 2824 ' and type of p	UENTING U.S. RO 3/8" DT, FRAC 200 200 200 200 200 200 200 200 200 20	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF DO gals 15% H WELL STAT shut-in) WATER-BBL. 5	PACKER BET (MD) PACKER BET (MD) ULEEZE, ETC. MATERIAL USED HC1 acid CUS (Producing or producing GAS-OIL RATIO 210
CASING SIZE 10 3/4" 7" 28. 31. PERFORATION REG 4" cased gur (30 shots) 33.* DATE FIRST PRODUCT 11-7-81 DATE OF TEST 11-9-81 FLOW, TUBING PRESS.	TOP (MD) TOP (M	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) SC and number) from 2733' (CTION METHOD (X 1 ¹ / ₂ '' X 12 CHOKE SIZE CHOKE SIZE CHOKE SIZE CHOKE SIZE	ET (MD) H O' 5J. SACKS CEMENT* CONTROL TO 2824' TO 2824' TO 2824' TO 2824' TO 2824' CONTROL TEST PERIOD CENENT - EBL. CENENT	SIZE SCREEN (MI 32. DEPTH INT 2733' DDUCTION pumping size 011 - PBL 5 GAS	CI 150 sx 150 sx 30. 30. 30. 2 : ACID, SHO ERVAL (MD) - 2824 ⁺ and type of p CAS ACF.	UENTING U.S. RO 3/8" 	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF DO gals 15% H	PACKER SET (MD) PACKER SET (MD) UUEEZE, ETC. MATERIAL USED HC1 acid CUS (Producing or producing GAS-OIL RATIO 210 GRAVITY-API (CORR.)
CASING SIZE 10 3/4" 7" 28. 31. PERFORATION REG 4" cased gur (30 shots) 33.* DATE FIRST PRODUCT 11-7-81 DATE OF TEST 11-9-81 FLOW. TUBING PRESS. 34. DISPUSITION OF G	TOP (MD) TOP (MD) CORD (Interval, since the second secon	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) CC and number) from 2733' CTION METHOD (X 1 ¹ 2'' X 12 CHOKE SIZE 10 CHOKE SIZE 10 CHOKE SIZE 10 CHOKE SIZE 10 CHOKE SIZE 10 CHOKE SIZE 10 CHOKE SIZE 10 CHOKE SIZE 10 CHOKE SIZE CHOKE SI	ет (MD) / - н 0' 5'. SACKS CEMENT* E 2824' Tric	OLE SIZE SCREEN (MI 32. DEPTH INT 2733' DIDUCTION pumping size OIL - PRL. 5 GAS-1	CI 150 SX 150 SX 30. 30. 2 S ACID, SHO ERVAL (MD) - 2824' and type of p CAS- ACF.	UENTING U.S. RO 3/8" 	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF 00 gals 15% H WELL STAT shut-in) WATER-BBL. 5 RBL. 011 225	PACKER BET (MD) PACKER
CASING SIZE 10 $3/4^{11}$ 7" 28. 31. PERFORATION REG 4" cased gun (30 shots) 33.* DATE FIRST PRODUCT 11-7-81 DATE OF TEST 11-9-81 FLOW. TUBING PRESS. 34. DISPOSITION OF G Sold - E1 Pa	WEIGHT, LE/	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) EC and number) from 2733' (TION METHOD (X 1 ¹ / ₂ ¹¹ X 12 CHOKE SIZE 24-HOLE RATED fuel, rented, etc. Gas Compa	ET (MD) , , , , , , , , , , , , , , , , , , ,	0LE SIZE SCREEN (MI 32. DEPTH INT 2733* DEDUCTION pumping size 011-PRL. 5 GAS-1	Cl 150 sx 150 sx 30. 30. 30. 2 2 ACID. SHO ERVAL (MD) - 2824 ' 100 type of p CAS ACF.	UENTING U.S. RO 3/8" 	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF DO gals 15% H WATER-BBL. 5 -RBL. 012 25 TEST WITNESSED	PACKER BET (MD) PACKER BET (MD) ULEEZE, ETC. MATERIAL USED HCl acid CUS (Producing or producing or producing GRAVITT-API (CORR.) 5.9 BT
CASING SIZE 10 3/4" 7" 28. 31. PERFORATION REG 4" cased gut (30 shots) 33.* DATE FIRST PRODUCT 11-7-81 DATE OF TEST 11-9-81 FLOW. TUBING PRESS. 34. DISPUSITION OF G Sold - El Pa 35. LINT OF ATTACH	TOP (MD) TOP (MD) TOP (MD) COED (Interval, sin W/1 JSPF NOV TESTED 24 CASING PRESSUE AS (Sold, used for ISO Natural MENTS	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) FT om 2733' CTION METHOD (X 11 ₂ ¹¹ X 12 CHOKE SIZE 124-HOCE SIZE Juel, rented, etc. Gas Compa	ET (MD) , I H O' 5 J. SACKS CEMENT* LO 2824' TEC TESTING, gar lift, ' PUMP PROD'N, FOR TEST PERIOR OIL EBL. OIL EBL.	OLE SIZE SCREEN (MI 32. DEPTH INT 2733'- DDUCTION pumping size of 011- DBL 5 GAS	Cl 150 sx 150 sx 30. 30. 2 c ACID, SHO ERVAL (MD) - 2824' and type of p CAS- ACF.	UENTING U.S. RO 3/8" 	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF 00 gals 15% H WELL STAT shut-in) WATER-BBL. 5 -RBL. 011 225	PACKER BET (MD) PACKER BET (MD) PACKER BET (MD) ULEEZE, ETC. MATERIAL USED HC1 acid CUS (Producing or Producing GAS-OIL RATIO 210 CRAVITY-API (CORR.) 5.9 BT
CASING SIZE 10 $3/4^{11}$ 7" 29. 31. PERFORATION REC 4" CASED GUT (30 shots) 33.* DATE FIRST PRODUCT 11-7-81 DATE OF TEST 11-9-81 FLOW, TUBING PRESS. 34. DISPOSITION OF G Sold - El Pa 35. LINT OF ATTACH - 36. Thereby certify	TOP (MD) TOP (M	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) SC and numler) from 2733' (CTION METHOD (X 112'' X 12 CHOKE SIZE 12 CHOKE SIZE 14 CALCULATED 24 HOLE RAT Juel, rented, etc. Gas Compa	PT (MD)	OLE SIZE SCREEN (MI 32. DEPTH INT 2733' DUUCTION pumping size of CIL- DUL. 5 GAS- 1 DUUCTION	Cl 150 SX 150 SX 30. 30. 30. 30. 30. 2 2 ACID. SHO ERVAL (MD) - 2824 ⁺ 10. CAS ACF. Ct as determined	UENTING U.S. RO 3/8" 	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF 00 gals 15% H water-BBL. 5 -RBL. 011 225 012 158T WITNESSED All available record	PACKER BET (MD) PACKER BET (MD) UEEZE, ETC. MATERIAL USED HC1 acid VUS (Producing or producing GRAVITY-API (CORR.) 5.9 BT
CASING SIZE 10 3/4'' $7''$ 28. 31. PERFORATION REG 4'' CASED GUT (30 shots) 33.* DATE FIRST PRODUCT 11-7-81 DATE OF TEST 11-9-81 FLOW. TUBING PRESS. 34. DISPOSITION OF G Sold - El Pa 35. LINT OF ATTACH - 36. I hereby certify	TOP (MD) TOP (M	FT. DEFTH 64 41 293 LINER RECORD BOTTOM (MD) CC and number) from 2733' CTION METHOD (X 1 ¹ 2'' X 12 CHOKE SIZE 10 CHOKE SIZE 10	ET (MD) H O' 5 J. SACKS CEMENT* LO 2824' TEC PROD'N. FOR TEST PERIOD PROD'N. FOR TEST PERIOD CE OIL- BBL. CE	SCREEN (MI SCREEN (MI 32. DEPTH INT 2733' - 2733' - DDUCTION pumping size of CIL- PRL 5 CAS-1 DDEFE and correct	Cl 150 sx 150 sx 30. 30. 2 30. Cl as determined Cl as deter	UENTING U.S. RO 3/8" 	TUBING RECORD DEPTH BET (MD) 2800 TURE, CEMENT SQ MOUNT AND KIND OF 00 gals 15% H WELL STAT shut-in) WATER-BBL. 5 RBL. 011 225 012 1257 WITNESSED 1 all available record	PACKER BET (MD) PACKER

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*(See Instructions and Spaces for Additional Data on Reverse Side)

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	UNITEL DEPARTMEN C GEOLOG	D STATES DF THE INTE ICAL SURVEY	N. M. GUBCONSINCOMMISSO F. 19. BOX° 1980 Hobbs, New Mexico 8	B240 I.C. 03258	I (b)
(Do not use this f	orm for proposals to drill Use "APPLICATION FOR	ND REPORTS	ON WELLS back to a different reservoir.		
I. OIL Y GAS				7. UNIT AGREEMENT	T NAME
2. NAME OF OPERATOR				S. FARM OR LEASE	NAME
Maralo, Inc.				Sholes B	
P. O. Box 832, M: 4. LOCATION OF WELL (Re See also space 17 below At surface	idland, Texas port location clearly and w.)	79702 in accordance with a	iny State requirements.*	2 10. FIELD AND FOOL 10. FIELD AND FOOL 11. SEC., T., E., M., SURVEY OF A	L, OR WILDCAT
660' FSL and 660	FEL			Sec. 25.	25 S , 36E
14. PERMIT NO.	15. ELEV	ATIONS (Show whether	DF, NT, CR, etc.}	12. COUNTY OF PAR	RISH 13. STATE
		3021 GL		Lea	l New Mex
16.	Check Appropriate	e Box To Indicate	Nature of Notice, Report,	or Other Data	
	OTICE OF INTENTION TO :		501	BSEQUENT REPORT OF:	
TEST WATER SHUT-OF	F PULL OR AL	TER CASING	WATER SHUT-OFF	REPAIRI	NG WELL
FRACTURE TREAT	ABANDON*	COMPLETE	FRACTURE TREATMENT	ALTERIN	G CASING
REPAIR WELL	CHANGE PL.	ANS	(Other) Plug back	k & re-perf	X
(Other)			(Nore : Report re Completion or Rec	completion Report and Log	form.)
10-20-81 - Squeez sack flocele 2% (psi - held ok. W(10-21-81 - Tagged	conflete of perfs 2871 t acd perfs 2871 t CaCl ₂ . Squeezed OC 12 hours.	to 2910 w/75 d @ 2000#'s. 2832' (New PH	sx Class C 3% Halad Pressured tubing to 3TD). Spotted 150 gal	lates, including estimated ertical depths for all mar 4 + 75 sacks C 1000 psi and c 1s 15% HC1 from	lass C 5#/ asing to 500 2822-2734'.
10-20-81 - Squeez sack flocele 2% (psi - held ok. W(10-21-81 - Tagged Perf'd Upper Yate 2748;2754;2755;27 2820;2821;2822;28 held ok. Acidized 10-23-81 - Sand fl & 200 sx 20-40 me 10-31-81 - Ran 2" 11-9-81 - Put wel	conflete of perfs 2871 t acd perfs 2871 t CaCl ₂ . Squeezed OC 12 hours. 1 top cement @ 2 es gas sands w/4 772;2773;2778;27 323;& 2824': (30 1 w/1800 gals of Frac'd Upper Yat esh sand & 100 ' x 1 ½'' x 12' p 1 on production	2832' (New PH 4' cased gun 779;2780;2785 0 holes). Set 5 15% acid. I ces perfs 273 5 x 10-20 mes 5 y 10-20 mes 5 y 10-20 mes	sx Class C 3% Halad Pressured tubing to 3TD). Spotted 150 gal w/l JSPF @:2733; 272 5;2786;2791;2811;2812 packer @ 2673'. Pre 3-2824' (30 holes) w sh sand in two stages - 3/4" rods.	Attes, including estimated ertical depths for all mar 4 + 75 sacks C 1000 psi and ca 1s 15% HC1 from 34;2735;2736;274 2;2813;2814;281 essured annulus rs after each a a/20,000 gal genes.	lass C 5#/ asing to 500 2822-2734'. 42;2746;2747 7;2818;2819; to 500 psi 250 gals aci 11ed fresh w
10-20-81 - Squeez sack flocele 2% (psi - held ok. W(10-21-81 - Tagged Perf'd Upper Yate 2748;2754;2755;27 2820;2821;2822;28 held ok. Acidized 10-23-81 - Sand fl & 200 sx 20-40 me 10-31-81 - Ran 2" 11-9-81 - Put wel	conflete of perfs 2871 t well is directionally drille CaCl ₂ . Squeezed OC 12 hours. I top cement @ 2 es gas sands w/4 772;2773;2778;27 323;& 2824': (30 I w/1800 gals of Frac'd Upper Yat esh sand & 100 ' x 1 ½' x 12' p 1 on production	Clearly state all port ed. give subsurface 1 to 2910 w/75 d @ 2000#'s. 2832' (New PH 4" cased gun 779;2780;2785 0 holes). Set 5 15% acid. I tes perfs 273 sx 10-20 mes pump on 110 -	neul details, and give pertinent d ocations and measured and true v sx Class C 3% Halad Pressured tubing to 3TD). Spotted 150 gal w/l JSPF @:2733; 273 5;2786;2791;2811;2812 5;2786;2791;2814 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791;2812 5;2786;2791 5;2786;2791;2812 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786;2791 5;2786 5;2797 5;2786 5;2786 5;2786 5;2786 5;2786 5;2786 5;2786 5;2786 5;2797 5;2786 5;2786 5;2786 5;2797 5;2786 5;2785	Attes, including estimated ertical depths for all mar 4 + 75 sacks C 1000 psi and ca 1s 15% HC1 from 34;2735;2736;274 2;2813;2814;281 essured annulus rs after each a w/20,000 gal get s.	lass C 5#/ asing to 500 2822-2734'. 42;2746;2747 7;2818;2819; to 500 psi 250 gals aci 11ed fresh w
10-20-81 - Squeez sack flocele 2% (psi - held ok. W(10-21-81 - Tagged Perf'd Upper Yate 2748;2754;2755;27 2820;2821;2822;28 held ok. Acidized 10-23-81 - Sand f & 200 sx 20-40 me 10-31-81 - Ran 2" 11-9-81 - Put wel	confleteD offerations (C well is directionally drille CaCl ₂ . Squeezed OC 12 hours. I top cement @ 2 es gas sands w/4 72;2773;2778;27 323;& 2824': (3C I w/1800 gals of Frac'd Upper Yat esh sand & 100 ' x 1 ½' x 12' p 1 on production	Clearly state all porti ed. give subsurface 1 to 2910 w/75 d @ 2000#'s. 2832' (New PH 4" cased gun 779;2780;2785 0 holes). Set 5 15% acid. I tes perfs 273 sx 10-20 mes bump on 110 -	neul details, and give pertinent details, and measured and true v sx Class C 3% Halad Pressured tubing to 3TD). Spotted 150 gal w/l JSPF @:2733; 273 5;2786;2791;2811;2813 5;2865 5;2786;2791;2811;2813 5;2865 5;2865 5;2865 5;2975 5;2786;2975 5;2786;2975 5;2786;2975 5;2786;2791;2811 5;2855 5;2855 5;2975 5;2786 5;2786	Attes, Including estimated ertical depths for all mar 4 + 75 sacks C 1000 psi and ca 1s 15% HC1 from 34;2735;2736;274 2;2813;2814;281 essured annulus rs after each a/20,000 gal ge s.	lass C 5#/ asing to 500 2822-2734'. 42;2746;2747 7;2818;2819; to 500 psi 250 gals aci 11ed fresh w
10-20-81 - Squeez sack flocele 2% (psi - held ok. W(10-21-81 - Tagged Perf'd Upper Yate 2748;2754;2755;27 2820;2821;2822;28 held ok. Acidized 10-23-81 - Sand fl & 200 sx 20-40 me 10-31-81 - Ran 2" 11-9-81 - Put wel	conflicted of the foregoing is true and	correct	neul details, and give pertinent d ocations and measured and true v sx Class C 3% Halad Pressured tubing to 3TD). Spotted 150 gal w/l JSPF @:2733; 272 5;2786;2791;2811;2812 packer @ 2673'. Pre Dropped 4 ball sealer 3-2824' (30 holes) v sh sand in two stages - 3/4" rods.	Attes, Including estimated ertical depths for all mar 4 + 75 sacks C 1000 psi and ca 1s 15% HC1 from 34;2735;2736;274 2;2813;2814;281 essured annulus rs after each a/20,000 gal ge s. 19 1981	L-11-81
10-20-81 - Squeez sack flocele 2% (psi - held ok. W(10-21-81 - Tagged Perf'd Upper Yate 2748;2754;2755;27 2820;2821;2822;28 held ok. Acidized 10-23-81 - Sand ff & 200 sx 20-40 me 10-31-81 - Ran 2" 11-9-81 - Put wel 18. I bereby certify that for SIGNED (This space for Feder	conflicted office use)	correct	neul details, and give pertinent d ocations and measured and true v sx Class C 3% Halad Pressured tubing to 3TD). Spotted 150 gal w/l JSPF @:2733; 273 5;2786;2791;2811;2812 packer @ 2673'. Pre Dropped 4 ball sealer 33-2824' (30 holes) v sh sand in two stages - 3/4" rods.	Attes, Including estimated ertical depths for all mar 4 + 75 sacks C 1000 psi and ca 1s 15% HC1 from 34;2735;2736;274 2;2813;2814;281 essured annulus rs after each a/20,000 gal ge s. 19 1981	L-11-81
10-20-81 - Squeez sack flocele 2% (psi - held ok. W(10-21-81 - Tagged Perf'd Upper Yate 2748;2754;2755;27 2820;2821;2822;28 held ok. Acidized 10-23-81 - Sand fl & 200 sx 20-40 me 10-31-81 - Ran 2" 11-9-81 - Put wel 11-9-81 - Put wel 11-9-81 - Put wel	conflicted offerations (C well is directionally drille cacl perfs 2871 t Cacl Squeezed OC 12 hours. I top cement @ 2 es gas sands w/4 72;2773;2778;27 323;& 2824': (30 I w/1800 gals of Frac'd Upper Yat esh sand & 100 ' x 1 ½'' x 12' p 1 on production the foregoing is true and max offeration al or State office use) PROVAL, IF ANY:	correct	neul details, and give pertinent d ocations and measured and true v sx Class C 3% Halad Pressured tubing to 3TD). Spotted 150 gal w/l JSPF @:2733; 27: 5;2786;2791;2811;2812 packer @ 2673'. Pre 3-2824' (30 holes) v sh sand in two stages - 3/4" rods.	Attes, including estimated ertical depths for all mar 4 + 75 sacks C 1000 psi and ca 1s 15% HC1 from 34;2735;2736;274 2;2813;2814;281 essured annulus rs after each 2 w/20,000 gal get s. 19 1981	L-11-81

RAILROAD COMMISSION REPORTS PREPARED LEASE APPRAISALS EVALUATIONS

EVERETT L. SMITH

REGISTERED PROFESSIONAL ENGINEER

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AND ENGINEERING SERVICE

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MIDLAND, TEXAS

March 22, 1962

COMPLETE ENGINEERING SERVICE BOTTOM HOLE PRESSURES GAS-OIL RATIOS WELL COMPLETIONS

LAMAR ESCHBERGER REGISTERED PROFESSIONAL ENGINEER

New Mexico Oil Conservation Commission P. O. Box 871 Santa - e, New Mexico

> Re: Application for Non-Standard Das Foration Unit in Jalmat Pool, Lea County, New Mexico

Gentlemen:

Please consider this letter a Surmal application by Ralph Lowe for a 160-acre Non-Standard Gas Provation Unit for his Sholes "B" 2 well located in the Jalmat Fool, 660 feet from the South and Fast lines of Section 25, Township 255, Range 36E, Lea County, New Merico.

The Sholes "B" 2 was originally completed on August 25, 1947, as an oil well in the lower Yates dolomite. As the result of being flooded out by water due to natural causes, the well is no longer capable of producing oil. However, a sand section behind the casing, but still in the lower Yates formation, is capable of commercial dry gas production.

Fince the sand section exists throughout the entire Sholes "B" Lease and is productive, it is requested that Sholes "B" 2 be assigned the 160 acres outlined in red on the attached plat for gas well provation purposes.

Yours truly,

Archie . Farr Petroleum Engineer

APF: jvb

Attachment

cc: Cil Conservation Commission (2) P. O. Box 2045 Hobbs, New Mexico

TICO OIL CONSERVATION COMM! ON NEW Santa Fe, New Mexico

(Form C-104) Ravised 7/1/57

REQUEST FOR (OIL) - (GAS) ALLOWABLE

New Well

This form shall be submitted by the operator before an initial allowable will be assigned to any completed Oil or Gas well. Form C-104 is to be submitted in QUADRUPLICATE to the same District Office to which Form C-101 was sent. The allowable will be assigned effective 7:00 A.M. on date of completion or recompletion, 1982 vAR toOral is filet doing calendar month of completion or recompletion. The completion date shall be that date in the case of an oil well when new oil is delivered into the stock tanks. Gas must be reported on 15.025 psia at 60° Fahrenheit.

			Midland, Texas	4/27/62
			(Place)	(Date)
WE ARE	HEREBY R	EQUESTI	G AN ALLOWABLE FOR A WELL KNOWN AS:	
Ral	h Lowe		Sholes "B" -25 Well No. 2 SE	
(C	ompany or Oy	rator)	(Lease)	
		25	, T. 25-S , R 36-E , NMPM., Jalmat	Pool
Unit I	Los		5/25/47	6/25/47
••••••••••••••••••••••••••••••••••••••	1/Cd		County. Date Spudded 3021 2955	2915
Ple	ase indicate	location:	2871 PE	
DT	C B	A	Top Oil/Gas Pay Name of Prod. Form.	
			PRODUCING INTERVAL -	
			Perforations 2871-75; 2820-82; 2884-94; 2902-10	
E	F G	H	Open Hole Dept Casing Shoe 2918 Tubi	h 2840
L	KJ	T	OIL WELL IESI -	Choke
-	- -		Natural Prod. Test:bbls.oil,bbls water inh	rs,min. Size
			Test After Acid or Fracture Treatment (after recovery of volume of oil	equal to volume of
M	NO	P	load oil used); bbls.oil. bbls water in hrs.	Choke min. Size
	1	X	CAL WELL TROP	
			DAS MELL LESI -	
			Natural Prod. Test:MCE/Oay; Hours flowedCh	oke Size
Tubing ,Ce	sing and Cem	enting Recor	Method of Testing (pitot, back pressure, etc.):	•
Sire	Feet	SAX	Test After Acid or Fracture Treatment: 780 MCF/Day; Ho	urs flowed 24
			Choke Size 1/2 Method of Testing: Orifice meter	
10 3/4	410	150		
8 5/5	1225	-	Acid or Fracture Treatment (Give amounts of materials used, such as ac	id, water, oil, and
0 37	LEAD		sand): acidized 1000 gal. 10/9/61	
7	2918	150	Casing Tubing Date first new	
			Press press oil run to tanks	
2 1/2	2 2840	-	Gil Transporter NORE	
	11-11 -1	lunned he	Gas Transporter El Paso Natural Gas Company	
Remarks:.	well p	lugged ba	K TEOM OIT SOUS @ 2330-33 CO Ras Sous BHOWN ADOVE.	•••••••••••••••••••••••••••••••••••••••
				••••••••••••••••••••••••••••••••••••••
I here	by certify th	at the infor	mation given above is true and complete to the best of my knowledge.	
Annowed			19 Ralph Lowe	1
		2	(Company or Operator)	
0	IL CONSEL	VATION	COMMISSION BUEG21 mm	m
	CONSE	- ALIGA	(Signature)	1
Bui	7.7	11	Title Agent	V
My		/	Send Communications regardin	g well to:
Title	······		Balah I	
~		/	Name	
			Address	id, Texas

Form C-102

NEW MEXICO OIL CONSERVATION COMMISSION

Santa Fe, New Mexico

MISCELLANEOUS NOTICES

Submit this notice in triplicate to the Oil Conservation Commission or its proper agent before the work specified is to begin. A copy will be returned to the sender on which will be given the approval, with any modifications considered advisable, or the rejection by the Commission or agent, of the plan submitted. The plan as approved should be followed, and work should not begin until approval is obtained. See additional instructions in the Rules and Regulations of the Commission.

Indicate nature of notice by checking below:

NOTICE OF INTENTION TO TEST CASING SHUT-OFF	x	NOTICE OF INTENTION TO SHOOT OR CHEMICALLY TREAT WELL	
NOTICE OF INTENTION TO CHANGE PLANS		NOTICE OF INTENTION TO PULL OR OTHERWISE ALTER CASING	
NOTICE OF INTENTION TO REPAIR WELL		NOTICE OF INTENTION TO PLUG WELL	
NOTICE OF INTENTION TO DEEPEN WELL			
	Mid	lland, Texas June 30, Place Date	1947
OIL CONSERVATION COMMISSION, Santa Fe, New Mexico.			

Gentlemen:

Q en en en en en

Fo	llowing is a notice o	f intention to do a	certain work as des	cribed below	at the			
	Ralph Lowe	1	Shole	S	Well	No. 2	in SE	of SE
-	Company or Operat	tor	Lease					
of	Sec25,	т. 25_,	R36,	N. M. P. M.,	181			Field,
	T.ea		Commenter					

FULL DETAILS OF PROPOSED PLAN OF WORK

FOLLOW INSTRUCTIONS IN THE RULES AND REGULATIONS OF THE COMMISSION

Set 410 feet of 10 3/4" casing - cemented with 150 sacks

Set 1225 feet of 8 5/8" casing - mudded in

Set 2935 feet of 7" casing - cemented with 150 sacks

Approved	Ralph Lowe
except as follows:	Company or Operator
· · · · · · · · · · · · · · · · · · ·	By jowes
	Position Agent
	Send communications regarding well to
OIL CONSERVATION COMMISSION,	Name Ralph Lowe
Ву	Address Box 832
Title	Midland, Texas



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 . 101 E. MARLAND . HOBBS, NM 88240

ANALYTICAL RESULTS FOR EDDIE SEAY CONSULTING ATTN: EDDIE SEAY 601 W. ILLINOIS HOBBS, NM 88240 FAX TO:

Receiving Date: 03/08/00 Reporting Date: 03/14/00 Project Owner. Fulfer Project Name: Brown SWD Project Location: JAL, NM Sampling Date: 03/08/00 Sample Type: PRODUCED WATER Sample Condition: COOL 7 INTACT Sample Received By: BC Analyzed By: AH

AB NUMBER SAMPLE ID	P-Alkalinity	T-Alkalinity	Hardness	Chloride	Sulfates	pH (su)
	(()	((1100-1)	(118/2)	(0.0.)
ANALYSIS DATE	03/13/00	03/13/00	03/13/00	03/13/00	03/13/00	03/13/00
14702-1 7 RIVERS	0	144	3650	8460	3080	7.41
H4702-2 QUEEN	0	820	1550	5640	529	7.20
H4702-3 DEVONIAN	0	1500	15400	20700	10600	7.55
H4702-4 LM	0	710	11500	38500	2340	6.93
Quality Control	NR	NR	53	958	50.5	6.99
True Value QC	NR	NR	50	1000	50.0	7.00
% Recovery	NR	NR	106	96	101	100
Relative Percent Difference	NR	NR	7.5	4.0	0.2	0.4
METHODS: EPA 600/4-7	9-02 -	-	130.2	325.3	375.4	150,1
Standard Me	thod 2320 B	2320 B	-	-	-	-
ANALYSIS DATE	03/13/00	03/13/00	03/13/00	03/13/00	03/13/00	
HATO2 1 7 PIVEPS	00/10/00	00/10/00	477	03/13/00	03/13/00	
			1 1// 1	143000	8200	1
H4702-2 QUEEN	0	0	1000	14300	5000	EV
H4702-2 QUEEN H4702-3 DEVONIAN	0	0	1000	14300 10300 48400	5000 - 42800	EL
H4702-2 QUEEN H4702-3 DEVONIAN H4702-4 LM	0	0	1000 1830 868	14300 10300 48400 98000	5000 - 42800 - 75000 -	
H4702-2 QUEEN H4702-3 DEVONIAN H4702-4 LM Quality Control	0 0 0 0	0 0 0 0	177 1000 1830 868 971	14300 10300 48400 98000 1392	8200 5000 - 42800 - 75000 - NR	
H4702-2 QUEEN H4702-3 DEVONIAN H4702-4 LM Quality Control True Value QC	0 0 0 0 NR NR	0 0 0 NR NR	177 1000 1830 866 971 1000	14300 10300 48400 98000 1392 1413	8200 5000 - 42800 - 75000 - NR NR	
H4702-2 QUEEN H4702-3 DEVONIAN H4702-4 LM Quality Control True Value QC % Recovery	0 0 0 0 NR NR NR	0 0 0 NR NR NR	177 1000 1830 866 971 1000 97	14300 10300 48400 98000 1392 1413 99	8200 - 5000 - 42800 - 75000 - NR NR NR	
H4702-2 QUEEN H4702-3 DEVONIAN H4702-4 LM Quality Control True Value QC % Recovery Relative Percent Difference	0 0 0 NR NR NR NR NR	0 0 0 NR NR NR NR	177 1000 1830 866 971 1000 97	14300 10300 48400 98000 1392 1413 99 0.2	8200 5000 - 42800 75000 - NR NR NR NR	
H4702-2 QUEEN H4702-3 DEVONIAN H4702-3 DEVONIAN H4702-4 LM Quality Control True Value QC % Recovery Relative Percent Difference	0 0 0 NR NR NR NR	0 0 0 NR NR NR	177 1000 1830 868 971 1000 97	14300 10300 48400 98000 1392 1413 99 0.2	8200 5000 - 42800 - 75000 - NR NR NR NR NR	
H4702-2 QUEEN H4702-3 DEVONIAN H4702-3 DEVONIAN H4702-4 LM Quality Control True Value QC % Recovery Relative Percent Difference METHODS: EPA 600/4-7 Standard Me	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0 0 NR NR NR - 2320 P	177 1000 1830 868 971 1000 97 -	14300 10300 48400 98000 1392 1413 99 0.2 120.1	8200 5000 - 42800 - 75000 - NR NR NR NR 160.1	

PLEASE WOTE XLAGIIIV and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed walved unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services harsunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise.



ANALYTICAL RESULTS FOR EDDIE SEAY CONSULTING ATTN: EDDIE SEAY 601 W. ILLINOIS HOBBS, NM 88242 FAX TO: (575) 392-6949

Receiving Date: 05/07/08 Reporting Date: 05/09/08 Project Owner: G. FULFER Project Name: FULFER OIL - SWD Project Location: JAL, NM Sampling Date: 05/07/08 Sample Type: GROUNDWATER Sample Condition: INTACT Sample Received By: ML Analyzed By: HM/KS

	Na	Ca	Mg	ĸ	Conductivity	T-Alkalinity
LAB NUMBER SAMPLE ID	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(uS/cm)	(mgCaCO ₃ /L)
ANALYSIS DATE:	05/09/08	05/09/08	05/09/08	05/07/08	05/07/08	05/07/08
H14760-1 FOS - WW #1	150	42	35	8.78	988	296
Quality Control	NR	52.9	48.6	2.57	1,410	NR
True Value QC	NR	50.0	50.0	3.00	1,413	NR
% Recovery	NR	106	97.2	85.7	99.8	NR
Relative Percent Difference	NR	3.1	7.7	4.0	0.1	NR
METHODS:	SM	3500-Ca-D	3500-Mg E	8049	120.1	310.1

	CI ⁻	SO4	CO3	HCO ₃	pН	TDS
	(mg/L)	(mg/L)	(mg/L)	(mg/L)	(s.u.)	(mg/L)
ANALYSIS DATE:	05/07/08	05/08/08	05/07/08	05/07/08	05/07/08	05/06/08
H14760-1 FOS - WW #1	60	197	0	361	7.57	620
Quality Control	500	42.6	NR	988	7.05	NR
True Value QC	500	40.0	NR	1000	7.00	NR
% Recovery	100	106	NR	98.8	101	NR
Relative Percent Difference	4.1	5.2	NR	1.2	< 0.1	NR
METHODS:	SM4500-CI-B	375.4	310.1	310.1	150.1	160.1

Chemis

05-12-08 Date



PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In the Cold matchatrial be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above-stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.
ARDINAL LABORATORIES

	101 East Marland	d, Hobbs, NM 8824	0																					
(505) 393-2326 Fax (505) 393-2476													Page of											
Driet Manager 1566 Deer Workthy								BILL TO						ANALYSIS REQUEST										
Project Manager: Edit & Sem								P.O. #:							1			1						
Address: 601 w Illings								Company: SAME																
City: UHas State: NM Zip: 88240							A	Attn: Qa																
Phone #: 2.236 Fax #: 2.6949								Address:													1			
Project #: Fulfar Oil Project Owner: G. Fulfa							C	City:																
Project Name: Fuller Sil - Sul							s	State: Zip:																
Project Location: Jack NM							F	Phone #:													1			
Sampler Name: E Jan Sea								Fax #:																
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PLEASE NOTE: Liability a analyses. All claims includ	nd Damages. Cardinal's liability ar ing those for negligence and any c	nd client's exclusive remedy for a other cause whatsoever shall be	ny claim ai leemed wi	ising whe	ther base ss made	in writin	ntract or ng and re	tort, sha ceived l	by Card	nited to linal wi	o the amount pair ithin 30 days afte	by the client for r completion of th	the he applicabl	le		30 days	past due	at the rate	erest will t of 24% p	er annum fi	on all account on the orig	ints more that inal date of it	an ivoice.	
service. In no event shall C affiliates or successors aris	Cardinal be liable for incidental or or ing out of or related to the perform	consequental damages, including nance of services hereunder by C	without lin ardinal, re	nitation, b gardless	usiness in of whethe	nterrupt er sach (ions, los claim is l	s of use, based up	, or loss pon any	of pro	ofits incurred by c above stated re	lient, its subsidiar asons or otherwis	nies, se.			and all	costs of co	ollections.	including (attorney's fe	tês.			
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Sampler - UPS - Bus - Other:							Yes	MODE																

† Cardinal cannot accept verbal changes. Please fax written changes to 575-393-2476.



Groundwater

FULFER OIL & CATTLE LLC

RE: Maralo Sholes B #2 Unit P, Sect.25, T. 25 S., R. 36 E. API #30-025-09806

Dear Sir:

In accordance with the Rules and Regulations of the Oil Conservation Division of the State of New Mexico, you are being provided a copy of the C-108, Application for Authorization to Inject in to the above captioned well.

Any questions about the permit can be directed to Eddie W. Seay, (575)392-2236. Any objections or request for hearing must be filed with the Oil Conservation Division within fifteen (15) days from the date received. The OCD address is 1220 S. Saint Francis Drive, Santa Fe, NM 87504, (505)476-3440.

Thank you,

Eddin w hen

Eddie W. Seay, Agent 601 W. Illinois Hobbs, NM 88242 (575)392-2236 seay04@leaco.net

LEASE OWNERS AND OFFSETS

LAND OWNER: Bureau of Land Management 620 E. Greene St. Carlsbad, NM 88220

OFFSETS: Southwest Royalties Inc. 6 Desta Drive, Suite 2100 Midland, TX 79705





LEGAL NOTICE

Fulfer Öil & Cattle LLC, P.O. Box 578, Jal, New Mexico 88252, has filed a form C-108, Application for Authorization to Inject, with the Oil Conservation Division seeking administrative approval to convert the Maralo Sholes B Well No. 2, API No. 30-025-09806, located 660 feet from the South line and 660 feet from the East line, Unit P, of Section 25, Township 25 South, Range 36 East, NMPM, Lea County, New Mexico, to a commercial produced water disposal well. Injection of produced water originating from various formations and/or pools in Southeast New Mexico will be injected into the Lower Yates and Seven Rivers formations through the open hole interval from 2938' to 3055' through 3 1/2" plastic lined injection tubing installed in a packer set at approximately 2850'. The maximum injection rate is anticipated to be 5000 barrels of produced water per day at an initial maximum surface injection pressure of 500 psi.

Interested parties must file objections with the New Mexico Oil Conservation Division, 1220 S. St. Francis Drive, Santa Fe, NM 87504, within fifteen (15) days of the date of this publication. Additional information can be obtained by contacting Eddie W. Seay, (575)390-2454.

Affidavit of Publication

) SS.

STATE OF NEW MEXICO COUNTY OF LEA

Joyce Clemens being first duly sworn on oath deposes and says that she is Advertisting Director of THE LOVINGTON LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in Fuller Oil & Cattle LLC, excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled

Legal Notice

was published in a regular and entire issue of THE LOV- to a commercial produced

NGTON LEADER and not in any supplement thereof, for one (1) day, beginning with the issue of May 10 , 2008 and ending with the issue of May 10, 2008.

And that the cost of publishing said notice is the sum of \$32.24 which sum has been (Paid) as Court Costs.

Subscribed and sworn to before me this 13th day of may 2008

Debbie Schilling

Notary Public, Lea County, New Mexico My Commission Expires June 22, 2010

LEGAL NOTICE P.O. Box 578, Jal, New Mexico 88252, has filed a form C-108, Application for Authorization to Inject, with the Oil Conservation Division seeking administrative approval to convert the Maralo Sholes B Well No. 2, API No. 30-025-09806, located 660 feet from the South line and 660 feet from the East line, Unit P, of Section 25, Township 25 South. Range 36 East, NMPM, Lea County, New Mexico,

well. water disposal Injection of produced water originating from various formations and/or pools in Southeast New Mexico will be injected into the Lower Yates and Seven Rivers formations through the open hole interval from 2938' to 3055' through 3 1/2" plastic lined injection tubing installed in a packer set at approximately 2850'. The maximum injection rate is anticipated to be 5000 barrels of produced water per day at an initial maximum surface injection

pressure of 500 psi.

Interested parties must file objections with the New Mexico Oil Division, Conservation 1220 S. St. Francis Drive, Santa Fe, NM · 87504, within fifteen (15) days of the date of this publication. Additional information can be obtained by contacting Eddie W. Seay, (575)390-2454. Published in the Lovington Leader May 10, 2008:

Jones, William V., EMNRD

From: Jones, William V., EMNRD

Sent: Monday, May 05, 2008 2:41 PM

To: 'seay04@leaco.net'

Cc: Ezeanyim, Richard, EMNRD; Warnell, Terry G, EMNRD; Kautz, Paul, EMNRD; Sanchez, Daniel J., EMNRD

Subject: SWD Application on behalf of Fulfer Oil & Cattle LLC: Maralo Sholes B #2 API No. 30-025-09806 Unit P Sec 25 T25S R36E Lea County

575-395-9970 631-0522

The OCD received your application and after reviewing have the following questions and comments:

1) Rule 40 looks OK for Fulfer.

Hello Eddie:

2) AOR well 30-025-09812 reported transporting as late as 1996. The status of this well must be verified. Please ask SW Royalties whether this well is inactive with open perfs in the Yates/7Rivers or whether it has been TAed or P&Aed. If open in the injection interval and inactive, the well must be either TAed or P&Aed prior to injection.

3) Please attempt to find the nearest windmill or house water and get a recent analysis for our files.

4) Within this general area there have been at least three wells permitted for injection and all of these have been into the Lower Yates Seven Rivers.

5) Your application asks to inject into the Upper Yates abandoned Gas intervals, but is inconsistent with the geology write-up which mentions injection into the Lower Yates Seven Rivers.

6) There are two other operators in this general area with active Upper Yates gas wells: Cimarex Energy Co of Colorado and Inflow Petroleum Res. LP. These operators should also be noticed of your intention to inject into the Gas interval. \mathcal{OK} , \mathcal{OK}

7) Please send more evidence of the boundary of the Capitan Reef in this area and more discussion from a geologist about this. The map I am using shows this area to be within the Reef boundaries. Does Paul Kautz agree this well is 1-1/2 mile east of the Reef? Can you tell me which well's elogs to look at to verify this? Us the reef present below the 7 rivers in this well but dipping upward to the West - so not a problem in the Upper Yates?

If you really intended to inject into the open hole in this well from 2938 to 3055 please send in revised paperwork showing this and revise the newspaper notice and notices to the BLM and to Southwest Royalties, Inc. Be sure and verify this interval was always oil bearing and not part of the Upper Yates Gas and not connected to the Reef.

The application as it is written to inject into the Upper Yates abandoned gas interval must be denied. You do have the option to present this at an examiner hearing.

Let me know what you and Gregg Fulfer decide on this...

Regards,

William V. Jones PE New Mexico Oil Conservation Division 1220 South St. Francis Santa Fe, NM 87505 505-476-3448

REFILA a peur Application into The Joston / UPER Application into The Joston / JAVRS

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Injection Permit Checklist 2/8/07 SWD Order Number Dates: Division Approved District Approved Date Spudded: B LV Well Name/Num: Maralo, SHOLES B #2 API Num: (30-) 025- 09806 County: La Footages 660 FSL 660 FEL Sec 25 TSD 25 S Rge 36E NITY = Carela UC Contact EDDIE W. Seary Operator Name: FULFER OIL BX 578, JAL, UM 88252 Operator Address: Po Inj. Tubing Size: 3/2 82850 Planned Work: Commercian WPW 4 Current Status of Well: ED 00 Hole/Pipe Sizes Top/Method Depths Cement 13/4 410' Surface 13 150 OK 85/8 1225 MUSED in Intermediate 50 2935 Production 8 Last DV Tool **Open Hole/Liner** 2955 Plug Back Depth Diagrams Included (Y/N): Before Conversion Checks (Y/N): Well File Reviewed ELogs in Imaging OLD JALMat 60 well Producing (Yes/No) Intervals Formation 0 0 180 SaltPotash Capitan Reef Cliff House, Etc. Formation Above 588 PSI Max. WHIP Top Inj Interval Gpen Hole (Y/N) Bottom Inj Interval-2975 Formation Below Deviated Hole (Y/N) Fresh Water: Depths: Wells(Y/N) Me Analysis Included (Y/N): _____Affirmative Statement Salt Water Analysis: Injection Zone (Y/N/NA) _____ DispWaters (Y/N/NA) _____ Types: ____ Mineral Owner(s) Notice: Newspaper(Y/N) V Surface Owner BLM Other Affected Parties: Southers K.Yett AOR/Repairs: NumActiveWells _____ Repairs? _____ Producing in Injection Interval in AOR NC AOR Num of P&A Wells & Repairs? ---- Diagrams Included? RBDMS Updated (Y/N) AOR STRs: Sec Well Table Adequate (Y/N) Tsp UIC Form Completed (Y/N) Rae New AOR Table Filename This Form completed Sec Tsp Rge Conditions of Approval: Sec TSD Rge Data Request Sent WHICK Pools/00 To le in in Plug or Set KUN Kuu TNJ Surve AOR Required Work: STRUCT BE Uper 80' poor - Esol RVNS SHOULD Required Work to this Well: Nearent W MPMILL -025 - 09812 PU SWD_Checklist.xls/L 6/28/2007/8:22 AM Find our Fron Sw Royatto Page 1 of 1 NoTICE CHNOLOX Energy (C., THE FLOW POR, Rom LP

PHILLIP R. GOETZE

Oil Conservation Division

Energy, Minerals and Natural Resources Department, State of New Mexico

Over 39 years of experience developing and implementing a variety of projects with environmental, hydrologic, or regulatory applications.

PROFESSIONAL EXPERIENCES:

ñ

February 2013 to Present: Senior Petroleum Geologist / Hearing Examiner

Engineering Bureau, Oil Conservation Division, Energy, Minerals and Natural Resources Department

1220 South St. Francis Drive, Santa Fe, NM 87505

Administrative permitting for development and management of oil and gas resources under the state Oil and Gas Act. These projects include technical review of administrative applications and preparation of orders for non-standard locations, pool delineations, and non-standard proration units. Lead technical reviewer of applications for all Class II wells (including salt water disposal wells and enhanced oil recovery (EOR) projects) under the New Mexico primacy agreement with the United States Environmental Protection Agency (USEPA) for its Underground Injection Control (UIC) Program under the Safe Drinking Water Act. Hearing examiner for Division hearings for cases regarding both protested and unprotested applications for approval of non-standard oil and gas circumstances that cannot be administratively permitted. Additional assignments related to the position:

Provide technical assistance to District personnel and General Counsel staff regarding compliance issues for disposal and EOR wells.

Prepare quarterly reports for review by the UIC coordinator for submission to the USEPA.

Recommend changes in policy reflecting application of new technology or processes (e.g. injection rules per 19.15.26 NMAC).

Provided expert testimony before the Oil Conservation Commission for applications and in support of rulemaking (e.g. acid gas injection well applications).

Provided expert testimony before the New Mexico Water Quality Control Commission (NMWQCC) in support of rulemaking (e.g. expanded authority for UIC Class I hazardous disposal wells).

Appointed as hearing examiner by the Division Director under 19.15.4.18 NMAC. Assist Santa Fe and District personnel with the Division's Loss Control Program.

March 2007 to February 2013: Hydrogeologist / Environmental Scientist / Project Manager Gloreita Geoscience, Incorporated

1723 Second Street, Santa Fe, NM 87505

Multiple projects for environmental, hydrologic, and natural resource assessments including:

Los Alamos National Laboratory (LANL): contract team leader for ground-water sampling (including springs, shallow wells, monitoring wells with Baski and Westbay systems) in support of the Ground Water Stewardship Program; four years of sediment mapping and soil sampling for contaminants as part of the LANL assessment of geomorphic influences following the Cerro Grande and Las Conchas fires; geodetic surveying (with Trimble RTK GPS and Geodimeter total station units) and waste characterization sampling following LANL and New Mexico Environment Department (NMED) protocols.

Oversight of drilling, logging, and construction of deep exploration wells as part of Rio Rancho's City Water Program and the NM Office of the State Engineer (Ft. Sumner project).

Hydrologic modeling and ground-water abatement plan development for multiple dairy facilities in southern and eastern New Mexico.

Assistance in development of exploratory oil and gas projects for unconventional sources in the Galisteo Basin.

Phillip R. Goetze

Numerous Phase I Environmental Site Assessments (ESAs) for commercial, industrial, and undeveloped properties in northern New Mexico, Nevada, and Texas.

Establish protocols, sampling requirements, and compile data for annual reporting for clients with Closure and Post Closure plans for landfills.

Oversight of petroleum storage tank removals, closures, and Minimum Site Investigations following closure.

Preparation and annual reporting of NPDES permits for commercial clients in New Mexico.

Preparation and implementation of Stage I Abatement Plans for dairies in violation of the NMWQCC ground-water standards.

Quality assurance for ground-water modeling and various sampling programs including mandatory monitoring and special client-specific events.

April 2006 to January 2007: Hydrogeologist / Project Manager

Tetra Tech EM Incorporated

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6121 Indian School Road NE, Suite 205, Albuquerque, NM 87110

This position included responsibility for redevelopment of previous client relationships while maintaining obligations to state, Federal and private projects. Most significant projects include the following:

Supervising geologist for drilling, construction, and development of deep monitoring wells at Kirtland Air Force Base for Long-Term Monitoring Program.

Preparation of sampling and analysis plans for Texas Department of Criminal Justice landfills.

September 1999 to March 2006: Hydrogeologist / Project Manager

ASCG Incorporated of New Mexico (now the WH Pacific Corporation)

6501 Americas Parkway NE, Suite 400, Albuquerque, NM 87110

Responsible for a variety of environmental services for site assessment and remediation of contaminated sites associated with Federal, state, and private clients in New Mexico, Arizona, and the Navajo Nation. Significant projects entail the following:

Field Technical Leader (as subcontractor) for drilling, construction, and development of deep and shallow monitoring wells at LANL for 2005.

Developed and supervised assessment drilling programs for Risk-Based Corrective Action assessments of petroleum-contaminated NMED and Bureau of Indian Affairs (BIA) sites in New Mexico and Arizona.

Responsible for project development and management of soil and ground-water remediation of hydrocarbon and solvent-contaminated sites including quarterly water sampling events and air monitoring for compliance.

Supervised and participated in resolution of correction actions identified under USEPA CA/CO 1998-02 at approximately 35 Bureau of Indian Affairs federal facilities including review of asbestos programs, PCB investigations and remediations, Phase I ESAs for property transfer, AST/UST removals, hazardous waste disposal activities, environmental audits, and validation sampling of previous remedial activities.

Completed development and oversight of voluntary corrective actions of hazardous wastes cited in notice of violations at the Southwestern Polytechnic Indian Institute.

Provided sampling program for the AMAFCA Storm Water Study for assistance in compliance of the MS4 for the City of Albuquerque.

Completed assessment for hydrocarbon contamination and prepared plans for remedial actions for five locations at BIA facilities during the last quarter of 2004.

Phillip R. Goetze

July 1996 to August 1999: Geologist / Environmental Scientist; General Contractor Phillip R. Goetze, Consulting Geologist, Edgewood, New Mexico

Subcontractor for environmental firms providing on-site technical support and report preparation. Primary contractors included the following:

Billings and Associates, Inc., Albuquerque, New Mexico

Responsible for acquisition of both soil and water data for assessment and for installation of remediation systems for hydrocarbon-contaminated sites.

Roy F. Weston Inc., Albuquerque, New Mexico

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Temporary position with responsibilities for on-site supervisor for data acquisition (three drilling rigs), for health and safety monitoring, and for quality assurance of installation of multiple ground-water wells at a Department of Energy tailings remediation (UMTRA) site near Tuba City, Arizona.

January 1993 to July 1996: Project Geologist / Project Manager Billings and Associates, Inc.

6808 Academy Pkwy, E-NE, Suite A-4, Albuquerque, NM 87109

Responsible for acquisition of air, soil, and water data for site assessments related to leaking underground storage tanks throughout New Mexico. Participated and supervised installation, operation, and maintenance of biosparging/SVE remediation systems at five New Mexico locations. Site assessment activities included preparation of health and safety plans, drilling supervision, water and soil sampling preparation, chain-of-custody maintenance, analytical data review and compilation, and report preparation.

June 1985 to December 1992: Independent Geologist and Environmental Scientist

Phillip R. Goetze, Consulting Geologist, Albuquerque, New Mexico

Subcontracting services for data acquisition in geophysics and mineral exploration. Primary contractors included:

Charles B. Reynolds and Associates, Albuquerque, New Mexico

Performed functions of seismologist and crew chief for consulting group specializing in shallow seismic geophysics for environmental and engineering applications. Projects included USGS hydrologic assessment of Mesilla Bolson; plume and paleosurface mapping at Johnson Space Center facility north of Las Cruces; plume and paleosurface mapping in Mortandad Canyon and TA-22 site, LANL; plume and paleosurface mapping at Western Pipeline facility at Thoreau, NM; plume and paleosurface mapping at UNC Partners mill and tailings site north of Milan; engineering assessment of collapsible soils at Tanoan residential development and along the east edge of Albuquerque.

Glorieta Geoscience, Inc., Santa Fe, New Mexico

Initiated and conducted sampling program for assessing economic potential of low-grade gold occurrence in southwest New Mexico.

November 1983 to September 1984: Fluid Minerals Geologist

Bureau of Land Management, Department of Interior, Cheyenne, Wyoming

Temporary detail to Casper office to alleviate backlog of assessments of federal oil and gas leases in Wyoming and Nebraska. Assessments required geologic evaluation of oil and gas potential for lands in Powder River, Wind River, Big Horn and Denver-Julesburg Basins. Determination of "known geologic structures (KGSs)" per Secretarial Order for categorizing of federal oil and gas minerals into competitive and non-competitive status. Deposed as expert witness and provide expert summaries and affidavits for cases before the Interior Board of Land Appeals (example: Case No. IBLA 84-798 for protest of KGS delineation).

Phillip R. Goetze

June 1982 to September 1983: Field Geologist

United States Bureau of Mines, Department of Interior, Lakewood, Colorado

Assisted primary authors with field inventory and evaluation of mineral occurrences in 15 wilderness areas in Colorado (Central Mineralized Region), southern Wyoming, and eastern Utah. Field work included field mapping and sampling of abandoned mines and mineral occurrences within these areas and adjacent areas with potential impacts on wilderness designation. This assignment involved strenuous work in hazardous conditions such as underground investigations, high altitudes, and severe weather.

July 1979 to January 1982: Geologist

United States Geological Survey, Department of Interior, Casper, Wyoming and Lakewood, Colorado

First two years exclusively mapping, drilling, and classifying coal resources in south central Wyoming. Detailed for two years to special team for preparation of impact statement: one of four principle authors for the Cache Creek-Bear Thrust Environmental Impact Statement which documented effects of two proposed oil and gas wells in designated wilderness area near Jackson, Wyoming. Deposed as expert witness in federal court. Final year primarily responsible for assessments of federal oil and gas leases for lands in Wyoming and Nebraska.

July 1977 to July 1979: District Geologist

Bureau of Land Management, Department of Interior, Socorro District Office, Socorro, New Mexico

Responsible for District minerals program for federal lands in west central portion of state. Assisted in environmental reports for land exchanges, classification of saleable mineral sites, mining claim validity determinations, inspection of surface reclamation for mineral extractions, inspection of oil exploration and geothermal gradient wells, and assessments for location of water wells in support of grazing projects. Also detailed as initial suppression wildfire fighter (including tractor boss and crew chief).

EDUCATION:

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New Mexico Institute of Mining and Technology, Socorro, New Mexico Bachelor of Science in Geology, 1977

Additional Courses: EPA course requirements for Asbestos Inspector (10 years as active inspector); completion of state program for Licensed Contractor (NM; GS-29); EPA course requirements for Lead-Based Paint Risk Assessor (EPA Regions VI and IX; two years as active inspector); GSI Course *Application of Ground Penetrating Radar*, NGWA Course *Monitoring Natural Attenuation of Contaminants*.

PROFESSIONAL MEMBERSHIPS, LICENSES, OR CERTIFICATIONS:

American Association of Petroleum Geologists, Member No. 51,310

American Institute of Professional Geologist, Certified Professional Geologist No. 6,657 Alliance of Hazardous Materials Professionals, CHMM No. 11,401

ASTM International, Member No. 1,314,118 (Voting Member); Committees D18 (Soil and Rock) and E50 (Environmental Assessment, Risk Management and Corrective Action)

OSHA 40HR and 8HR Refresher Hazardous Waste Operations and Emergency Response (Current)

OSHA Hazardous Waste Operations and Emergency Response Manager/Supervisor (Current) State of Alaska, Licensed Professional Geologist No. 514

State of Arizona, Registered Professional Geologist No. 40,812

State of Nevada, Certified Environmental Manager No. 2,218

State of Texas, Licensed Professional Geologist No. 2,278

Case No. 15783 Division Exhibit No. 12

RULES

19.15.16.9 SEALING OFF STRATA:

A. During the drilling of an oil well, injection well or other service well, the operator shall seal and separate the oil, gas and water strata above the producing or injection horizon to prevent their contents from passing into other strata.

B. The operator shall ensure that fresh waters and waters of present or probable value for domestic, commercial or stock purposes are confined to their respective strata and are adequately protected by division-approved methods. The operator shall take special precautions by methods satisfactory to the division in drilling and abandoning wells to guard against loss of artesian water from the strata in which it occurs, and the contamination of artesian water by objectionable water, oil or gas.

C. The operator shall ensure that water is shut off and excluded from the various oil- and gas-bearing strata that are penetrated. The operator shall ordinarily make water shut-offs by cementing casing.

[19.15.16.9 NMAC - Rp, 19.15.3.106 NMAC, 12/1/08]

19.15.26.9 CASING AND CEMENTING OF INJECTION WELLS:

<u>The operator of a well used for injection</u> of gas, air, water or other medium into a formation <u>shall case the well with safe and adequate casing or tubing so as to</u> <u>prevent leakage, and set and cement the casing or tubing</u> to prevent the movement of formation or injected fluid from the injection zone into another zone or to the surface around the outside of a casing string.

[19.15.26.9 NMAC - Rp, 19.15.9.702 NMAC, 12/1/08]

